

**EPA REGISTRATION NUMBER 35935-38 – VOL. 1**

# Material to be added to an e-Jacket/Jacket

Reg. No. 35935-38

Description: Amended Label

1. ☒ Placement within the e-Jacket/jacket:

☒ Default: (chronological, top = newest)

☐ File Location: (PDF page number, i.e., "before page 45")

2. ☒ Send to Data Extraction contractors this material:

☒ Newly stamped accepted label

☐ Notification

☐ New CSF

☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Eugene Wilson

Phone: 305-6103 Division: RD/MB

Date: 2/18/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. Matthew Granahan  
Registration Manager  
Nufarm Americas, Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527

Dear Mr. Granahan:

SUBJECT: Dicamba Acid Technical  
EPA Registration No 35935-38  
Application and Letter Dated: October 22, 2009,  
Request To Amend Registration in Response To  
Agency's Letter Dated October 8, 2009, Resubmission  
of Application Form 8570-1, To Section III,  
2 and 4; Resubmission Application and Letter Dated  
January 7, 2010, Revised EPA 8570-1 and Labeling  
To Comply with PR Notice 2007-4

The proposed subject amendments to the registration of  
"Dicamba Technical" have been reviewed and were found acceptable  
under the Federal Insecticide Fungicide and Rodenticide  
Act (FIFRA), as amended, provided that you:

1. Revise the ingredient statement to comply with PR Notice 97-5; i.e., replace the chemical expression for dicamba with the CAS name: 3,6-dichloro-2-methoxybenzoic acid.
2. Submit one copy of the final printed labeling prior to shipping this pesticide product under the revised labeling.

If these condition are not complied with, this registration will be subject to cancellation in accordance with FIFRA, section 6(e). Your release for shipment of this product under the revised labeling constitutes acceptance of these conditions. A stamped copy of the accepted labeling is enclosed for your records.

Sincerely yours,

Kathryn V. Montague  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure

# DICAMBA ACID TECHNICAL

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

FEB 18 2010  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

35935-38

FOR MANUFACTURING PURPOSES ONLY

**ACTIVE INGREDIENT:**

Dicamba (3,6-dichloro-p-anisic acid) ..... 98.0%

**OTHER INGREDIENTS:** ..... 2.0%

**TOTAL:** ..... 100.0%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

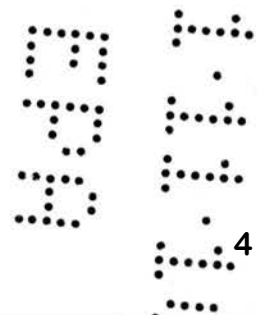
EPA REG. NO. 35935-38  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM LIMITED  
P.O. Box 13439  
RTP, NC 27709



NET CONTENTS

035935-00038.20100107.EPA.RV110909L





**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS  
DANGER**

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

| FIRST AID                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IF IN EYES                                                                                                                                                                                                                      | <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                       |
| IF SWALLOWED                                                                                                                                                                                                                    | <ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul> |
| IF ON SKIN<br>OR CLOTHING                                                                                                                                                                                                       | <ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                                                                                         |
| <b>HOT LINE NUMBER</b><br>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information. |                                                                                                                                                                                                                                                                                                                                                           |
| <b>NOTE TO PHYSICIAN</b><br>Probable mucosal damage may contraindicate the use of gastric lavage.                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                           |

**ENVIRONMENTAL HAZARDS**

Keep out of lakes, streams or ponds. Do not contaminate water by the cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

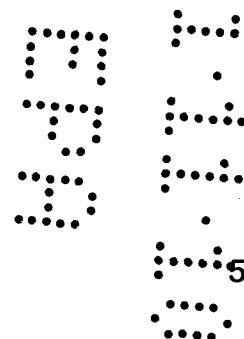
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This technical material may only be used to produce formulations that are registered or exempted from registration by the U.S. EPA. If it is desired to produce formulations that do not have prior approval, the producer of such formulations is responsible for providing all necessary data and for obtaining registration.

Only for Formulation Into A Herbicide For (1) The Following Use(s): asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, lawns, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms; (2) Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) Uses for experimental purposes that are in compliance with U.S. EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.



#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment, then offer for recycling if available, or dispose of empty bag in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

#### WARRANTY DISCLAIMER

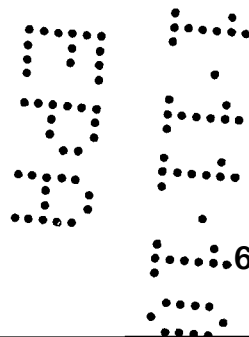
The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

#### LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV110909L)





**Nufarm Americas Inc.**

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

[www.us.nufarm.com](http://www.us.nufarm.com)

**Via Overnight Courier**

January 7, 2010

Joanne Miller (PM 23)  
Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

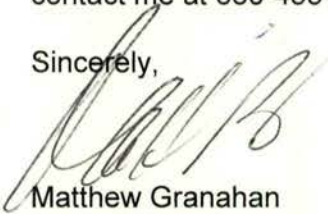
**Subject: Dicamba Technical, EPA Reg. No. 35935-38**

Dear Ms. Miller:

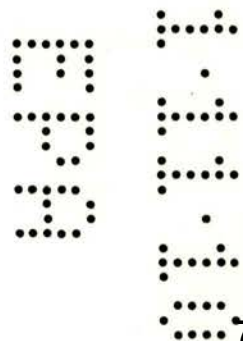
Enclosed please find updated labeling for Dicamba Technical, EPA Reg No 35935-38. Per an EPA letter dated November 9, 2009 this label is being submitted to be complaint with PR Notice 2007-04. The EPA Letter has also been included for a reference.

Should you have any questions or require any additional information please do not hesitate to contact me at 630-455-2048 or via email at [matthew.granahan@us.nufarm.com](mailto:matthew.granahan@us.nufarm.com).

Sincerely,

  
Matthew Granahan  
Registration Manger


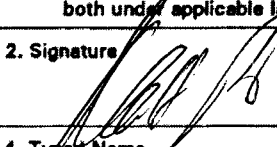
Enclosures





Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  | United States<br><b>Environmental Protection Agency</b><br>Washington, DC 20460                                                                                                                    |  | <input type="checkbox"/> Registration<br><input type="checkbox"/> Amendment<br><input checked="" type="checkbox"/> Other |  | OPP Identifier Number                                                                                                                                                                                                             |  |
| <b>Application for Pesticide - Section I</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| 1. Company/Product Number<br>35935-38                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  | 2. EPA Product Manager<br>Joanne Miller                                                                                                                                                            |  | 3. Proposed Classification<br><input type="checkbox"/> None <input type="checkbox"/> Restricted                          |  |                                                                                                                                                                                                                                   |  |
| 4. Company/Product (Name)<br>Dicamba Technical                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  | PM#<br>23                                                                                                                                                                                          |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Nufarm Limited<br>PO Box 13439<br>104 T.W. Alexander Drive<br>RTP, NC 27709<br><br><input type="checkbox"/> Check if this is a new address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:<br>EPA Reg. No. [REDACTED]<br><br>Product Name [REDACTED] |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| <b>Section - II</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| <input type="checkbox"/> Amendment - Explain below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____                                                                                                             |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  | <input type="checkbox"/> "Me Too" Application.                                                                                                                                                     |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| <input type="checkbox"/> Notification - Explain below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  | <input checked="" type="checkbox"/> Other - Explain below.                                                                                                                                         |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| <b>Explanation: Use additional page(s) if necessary. (For section I and Section II.)</b><br>Response to Phone Conversation with Eugene Wilson 01/07/2010 and EPA Letter dated 11/07/2009.<br>Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA. |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| <b>Section - III</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| 1. Material This Product Will Be Packaged In:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  | Unit Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                                                                                           |  | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                        |  | 2. Type of Container<br><input type="checkbox"/> Metal<br><input type="checkbox"/> Plastic<br><input type="checkbox"/> Glass<br><input type="checkbox"/> Paper<br><input checked="" type="checkbox"/> Other (Specify) <u>HDPE</u> |  |
| * Certification must be submitted                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  | If "Yes" Unit Packaging wgt. No. per container                                                                                                                                                     |  | If "Yes" Package wgt. No. per container                                                                                  |  |                                                                                                                                                                                                                                   |  |
| 3. Location of Net Contents Information<br><input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  | 4. Size(s) Retail Container<br>50 to 250 lbs, bulk                                                                                                                                                 |  | 5. Location of Label Directions<br><input checked="" type="checkbox"/>                                                   |  |                                                                                                                                                                                                                                   |  |
| 6. Manner in Which Label is Affixed to Product<br><input checked="" type="checkbox"/> Lithograph<br><input checked="" type="checkbox"/> Paper glued<br><input checked="" type="checkbox"/> Stenciled                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |  | <input checked="" type="checkbox"/> Other Self-Adhesive Integrated Label/ Booklet                                                                                                                  |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| <b>Section - IV</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |                                                                                                                                                                                                    |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| Name<br>Matthew Granahan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  | Title<br>Registration Manager                                                                                                                                                                      |  | Telephone No. (Include Area Code)<br>630-455-2048                                                                        |  |                                                                                                                                                                                                                                   |  |
| <b>Certification</b><br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.<br>I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                                                                                                                                                                                    |  |                                                                                                                          |  | 6. Date Application Received<br>(Stamped)<br>.....<br>.....<br>.....<br>.....<br>.....                                                                                                                                            |  |
| 2. Signature<br>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |  | 3. Title<br>Registration Manager                                                                                                                                                                   |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |
| 4. Typed Name<br>Matthew Granahan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  | 5. Date<br>01/07/2010                                                                                                                                                                              |  |                                                                                                                          |  |                                                                                                                                                                                                                                   |  |

\*Product ingredient source information may be entitled to confidential treatment\*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

RECEIVED

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

BY:.....

NOV 9

Mr. Matthew Granahan  
Registration Manager  
Nufarm Americas, Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527

Dear Mr. Granahan:

SUBJECT: Dicamba Technical  
EPA Registration No 35935-38  
Application and Letter Dated: October 22, 2009,  
Request To Amend Registration in Response To  
Agency's Letter Dated October 8, 2009, Resubmission  
of Application Form 8570-1, To Section III,  
2 and 4

The proposed subject amendment to the registration of  
"Dicamba Technical" has been reviewed and was found unacceptable  
under the Federal Insecticide Fungicide and Rodenticide  
Act (FIFRA), as amended, for the follow reasons:

1. Plastic, as a "Type of Container" will not change  
the **restriction** that the composition of the container  
must be that used in the Storage Stability and Corrosion  
study (EPA MRID No. 476582-01, re: Agency's Review,  
dated September 30, 2009); i.e., HDPE). Either  
revise the application Form 8570-1 to designate  
the composition of the container as HDPE, or  
submit a Storage Stability and Corrosion study  
with container of the same composition as used  
in the shipment of this pesticide product.
2. You must submit revised labeling to comply with  
PR Notice 2007-4, "Pesticide Management and Disposal:  
Standards for Pesticide Containers and Containment".  
for retail container, sizes 50, 250 lbs, and bulk.

Please respond to these requirements within the next

9 9

30 days from the date of this letter. As the required information has not been submitted, this product is subject to cancellation under 6(e) of FIFRA. In regard to comment 1, either submit a revised application form as indicated, or indicate when you will submit Storage Stability and Corrosion data to support the claim indicating that the product is packaged in plastic other than HDPE.

Sincerely yours,

*Joanne I. Miller*

Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

9 5 3 10



**Nufarm Americas Inc.**

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

[www.us.nufarm.com](http://www.us.nufarm.com)

**Overnight Courier**

November 19, 2009

Joanne Miller (PM 23)  
Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

**Subject: EPA Application Form – 8570-1  
Dicamba Technical, EPA Reg. No. 35935-38**

Dear Ms. Miller:

Enclosed please find a completed 8570-5 EPA Form for the Registration Application of Dicamba Technical, EPA Reg No 35935-38. Per an EPA letter dated November 9, 2009 this application is being resent addressing the error on the correct Type of Container.

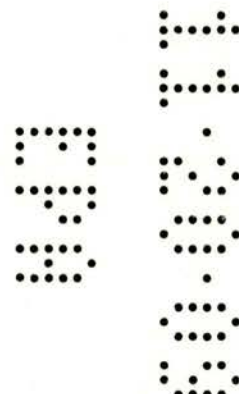
Should you have any questions or require any additional information please do not hesitate to contact me at 630-455-2048 or via email at [matthew.granahan@us.nufarm.com](mailto:matthew.granahan@us.nufarm.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Granahan', is written over the word 'Sincerely,'.

Matthew Granahan  
Registration Manger

Enclosures







30 days from the date of this letter. As the required information has not been submitted, this product is subject to cancellation under 6(e) of FIFRA. In regard to comment 1, either submit a revised application form as indicated, or indicate when you will submit Storage Stability and Corrosion data to support the claim indicating that the product is packaged in plastic other than HDPE.

Sincerely yours,

*Joanne I. Miller*

Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

SEP 13 1975



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

### Application for Pesticide - Section I

|                                                                                                                                                                                                   |                                                                                                                                                                                                |                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| 1. Company/Product Number<br>35935-38                                                                                                                                                             | 2. EPA Product Manager<br>Joanne Miller                                                                                                                                                        | 3. Proposed Classification<br><input type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name)<br>Dicamba Technical                                                                                                                                                    | PM#<br>23                                                                                                                                                                                      |                                                                                                 |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Nufarm Limited<br>PO Box 13439<br>104 T.W. Alexander Drive<br>RTP, NC 27709<br><br><input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:<br>EPA Reg. No. [REDACTED]<br>Product Name [REDACTED] |                                                                                                 |

### Section - II

|                                                                                |                                                                                        |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| <input type="checkbox"/> Amendment - Explain below.                            | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application.                                         |
| <input type="checkbox"/> Notification - Explain below.                         | <input checked="" type="checkbox"/> Other - Explain below.                             |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Application for Registration

### Section - III

|                                                                                                                                    |                                                                                          |                                                                                                                                                                                                                              |                   |                                                                                                                                                                                                    |                   |
|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| 1. Material This Product Will Be Packaged In:                                                                                      |                                                                                          |                                                                                                                                                                                                                              |                   | 2. Type of Container                                                                                                                                                                               |                   |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                | Unit Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                                                                                                            |                   | <input type="checkbox"/> Metal<br><input type="checkbox"/> Plastic<br><input type="checkbox"/> Glass<br><input type="checkbox"/> Paper<br><input checked="" type="checkbox"/> Other (Specify) HDPE |                   |
| * Certification must be submitted                                                                                                  |                                                                                          | If "Yes" Unit Packaging wgt.                                                                                                                                                                                                 | No. per container | If "Yes" Package wgt.                                                                                                                                                                              | No. per container |
| 3. Location of Net Contents Information<br><input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container |                                                                                          | 4. Size(s) Retail Container<br>50 to 250 lbs, bulk                                                                                                                                                                           |                   | 5. Location of Label Directions<br><input checked="" type="checkbox"/>                                                                                                                             |                   |
| 6. Manner in Which Label is Affixed to Product                                                                                     |                                                                                          | <input checked="" type="checkbox"/> Lithograph<br><input checked="" type="checkbox"/> Paper glued<br><input type="checkbox"/> Stenciled<br><input checked="" type="checkbox"/> Other Self-Adhesive Integrated Label/ Booklet |                   |                                                                                                                                                                                                    |                   |

### Section - IV

|                                                                                                                                                                                                                                                                                |  |                                  |  |                                                   |                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|----------------------------------|--|---------------------------------------------------|----------------------------------------------------------------------------------------|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)                                                                                                                                  |  |                                  |  |                                                   |                                                                                        |
| Name<br>Matthew Granahan                                                                                                                                                                                                                                                       |  | Title<br>Registration Manager    |  | Telephone No. (Include Area Code)<br>630-455-2048 |                                                                                        |
| Certification<br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete.<br>I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. |  |                                  |  |                                                   | 6. Date Application Received<br>(Stamped)<br>.....<br>.....<br>.....<br>.....<br>..... |
| 2. Signature<br>                                                                                                                                                                                                                                                               |  | 3. Title<br>Registration Manager |  |                                                   |                                                                                        |
| 4. Typed Name<br>Matthew Granahan                                                                                                                                                                                                                                              |  | 5. Date<br>11/19/09              |  |                                                   |                                                                                        |



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Mr. Matthew Granahan  
Registration Manager  
Nufarm Americas, Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527

9

Dear Mr. Granahan:

SUBJECT: Dicamba Technical  
EPA Registration No 35935-38  
Application and Letter Dated: October 22, 2009,  
Request To Amend Registration in Response To  
Agency's Letter Dated October 8, 2009, Resubmission  
of Application Form 8570-1, To Section III,  
2 and 4

The proposed subject amendment to the registration of  
"Dicamba Technical" has been reviewed and was found unacceptable  
under the Federal Insecticide Fungicide and Rodenticide  
Act (FIFRA), as amended, for the follow reasons:

1. Plastic, as a "Type of Container" will not change the **restriction** that the composition of the container must be that used in the Storage Stability and Corrosion study (EPA MRID No. 476582-01, re: Agency's Review, dated September 30, 2009); i.e., HDPE). Either revise the application Form 8570-1 to designate the composition of the container as HDPE, or submit a Storage Stability and Corrosion study with container of the same composition as used in the shipment of this pesticide product.
2. You must submit revised labeling to comply with PR Notice 2007-4, "Pesticide Management and Disposal: Standards for Pesticide Containers and Containment". for retail container, sizes 50, 250 lbs, and bulk.

Please respond to these requirements **within the next**

30 days from the date of this letter. As the required information has not been submitted, this product is subject to cancellation under 6(e) of FIFRA. In regard to comment 1, either submit a revised application form as indicated, or indicate when you will submit Storage Stability and Corrosion data to support the claim indicating that the product is packaged in plastic other than HDPE.

Sincerely yours,

JSI

Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

pm 23

# FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature: WASH, M.

| EPA Reg. Number: <u>35935-38</u>                                                |                                                                                   | EPA Receipt Date: <u>10/23/09</u> |    |    |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------|----|----|
|                                                                                 | Check List Item                                                                   | Yes                               | No | NA |
| 1                                                                               | Application Form (EPA Form 8570-1) -signed?                                       |                                   |    |    |
| 2                                                                               | Confidential Statement of Formula (EPA Form 8570-29) - signed?                    |                                   |    |    |
| 3                                                                               | Certification with Respect to Citation of Data (EPA Form 8570-34) signed?         |                                   |    |    |
| 4                                                                               | Formulator's Exemption Statement (EPA Form 8570-27) - signed?                     |                                   |    |    |
| 5                                                                               | Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]               |                                   |    |    |
|                                                                                 | a) Selective Method?                                                              |                                   |    |    |
|                                                                                 | b) Cite-All Method? Applicant owns data or list only the companies offered to pay |                                   |    |    |
|                                                                                 | c) Public copy of Matrix provided? See PR Notice 98-5                             |                                   |    |    |
| 6                                                                               | Is Label Included? (5 copies)                                                     |                                   |    |    |
| Comments:                                                                       |                                                                                   |                                   |    |    |
| <p>RESPONSE TO OCTOBER 8, 2009<br/>LETTER. NEW (FILE COPY)<br/>APPLICATION.</p> |                                                                                   |                                   |    |    |

# Fee for Service

<sup>perm</sup> {861089I~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr. 23

Receipt No.

S-

861089

EPA File Symbol/Reg. No.

35935-38

Pin-Punch Date:

10/23/2009

☒ This item is NOT subject to FFS action.

## Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

## Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *Shirley Ann Chew*

Date: 10/28/09


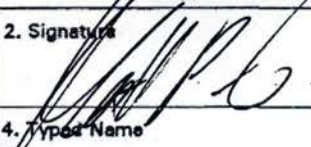
Remarks:

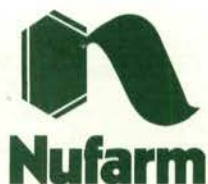




Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

|                                                                                                                                                                                                                                                                              |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
|                                                                                                                                                                                             |  | United States<br><b>Environmental Protection Agency</b><br>Washington, DC 20460                                                                                                                |  | <input checked="" type="checkbox"/> <b>Registration</b><br><input type="checkbox"/> <b>Amendment</b><br><input type="checkbox"/> <b>Other</b> | OPP Identifier Number |
| <b>Application for Pesticide - Section I</b>                                                                                                                                                                                                                                 |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| 1. Company/Product Number<br>35935-38                                                                                                                                                                                                                                        |  | 2. EPA Product Manager<br>Joanne Miller                                                                                                                                                        |  | 3. Proposed Classification<br><input type="checkbox"/> None <input type="checkbox"/> Restricted                                               |                       |
| 4. Company/Product (Name)<br>Dicamba Technical                                                                                                                                                                                                                               |  | PM#<br>23                                                                                                                                                                                      |  |                                                                                                                                               |                       |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Nufarm Limited<br>PO Box 13439<br>104 T.W. Alexander Drive<br>RTP, NC 27709<br><br><input type="checkbox"/> Check if this is a new address                                                                            |  | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:<br>EPA Reg. No. [REDACTED]<br>Product Name [REDACTED] |  |                                                                                                                                               |                       |
| <b>Section - II</b>                                                                                                                                                                                                                                                          |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| <input type="checkbox"/> Amendment - Explain below.                                                                                                                                                                                                                          |  | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____                                                                                                         |  |                                                                                                                                               |                       |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____                                                                                                                                                                                               |  | <input type="checkbox"/> "Me Too" Application.                                                                                                                                                 |  |                                                                                                                                               |                       |
| <input type="checkbox"/> Notification - Explain below.                                                                                                                                                                                                                       |  | <input checked="" type="checkbox"/> Other - Explain below.                                                                                                                                     |  |                                                                                                                                               |                       |
| Explanation: Use additional page(s) if necessary. (For section I and Section II.)<br>Application for Registration                                                                                                                                                            |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| <i>Joanne: I discussed this with 3 members - This is registered in his community</i>                                                                                                                                                                                         |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| <b>Section - III</b>                                                                                                                                                                                                                                                         |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| 1. Material This Product Will Be Packaged In:                                                                                                                                                                                                                                |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                                                                                                                                                          |  | Unit Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                                                                                       |  | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No                                             |                       |
| * Certification must be submitted                                                                                                                                                                                                                                            |  | If "Yes" Unit Packaging wgt. No. per container                                                                                                                                                 |  | If "Yes" Package wgt. No. per container                                                                                                       |                       |
| 2. Type of Container<br><input checked="" type="checkbox"/> Metal<br><input type="checkbox"/> Plastic<br><input type="checkbox"/> Glass<br><input type="checkbox"/> Paper<br><input type="checkbox"/> Other (Specify) _____                                                  |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| 3. Location of Net Contents Information<br><input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container                                                                                                                                           |  | 4. Size(s) Retail Container<br>50 to 250 lbs, bulk                                                                                                                                             |  | 5. Location of Label Directions<br><input checked="" type="checkbox"/> [X]                                                                    |                       |
| 6. Manner in Which Label is Affixed to Product<br><input checked="" type="checkbox"/> Lithograph<br><input checked="" type="checkbox"/> Paper glued<br><input type="checkbox"/> Stenciled                                                                                    |  | <input checked="" type="checkbox"/> Other Self-Adhesive Integrated Label/ Booklet                                                                                                              |  |                                                                                                                                               |                       |
| <b>Section - IV</b>                                                                                                                                                                                                                                                          |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)                                                                                                                                 |  |                                                                                                                                                                                                |  |                                                                                                                                               |                       |
| Name<br>Matthew Granahan                                                                                                                                                                                                                                                     |  | Title<br>Registration Manager                                                                                                                                                                  |  | Telephone No. (Include Area Code)<br>630-455-2048                                                                                             |                       |
| Certification<br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, or both under applicable law. |  |                                                                                                                                                                                                |  | 6. Date Application Received (Stamped)                                                                                                        |                       |
| 2. Signature<br>                                                                                                                                                                           |  | 3. Title<br>Registration Manager                                                                                                                                                               |  |                                                                                                                                               |                       |
| 4. Typed Name<br>Matthew Granahan                                                                                                                                                                                                                                            |  | 5. Date<br>10/22/09                                                                                                                                                                            |  |                                                                                                                                               |                       |



**Nufarm Americas Inc.**

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

www.us.nufarm.com

**Overnight Courier**

October 22, 2009

Joanne Miller (PM 23)  
Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

**Subject: EPA Application Form – 8570-1  
Dicamba Technical, EPA Reg. No. 35935-38**

Dear Ms. Miller:

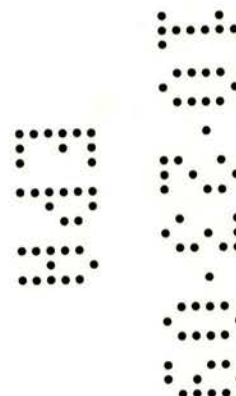
Enclosed please find a completed 8570-5 EPA Form for the Registration Application of Dicamba Technical, EPA Reg No 35935-38. This form was initially submitted on March 3, 2007, but was recently found to be lacking pertinent information. Per an EPA letter dated October 8, 2009 this application is being resent with the composition and sizes of containers specified.

Should you have any questions or require any additional information please do not hesitate to contact me at 630-455-2048 or via email at [matthew.granahan@us.nufarm.com](mailto:matthew.granahan@us.nufarm.com).

Sincerely,

  
Matthew Granahan  
Registration Manager

Enclosures







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

October 29, 2009

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

WILLIAM M. MAHLBURG  
NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

PRODUCT NAME: DICMBA ACID TECHNICAL  
COMPANY NAME: NUFARM LIMITED  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 35935-38  
EPA RECEIPT DATE: 10/23/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-6224.

Sincerely,

*P. K. Throck*

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

DATE OUT:

SUBJECT: STORAGE STABILITY (830.6317) & CORROSION CHARACTERISTICS  
(830.6320) REVIEW  
ACCELERATED STUDY [ ]; ONE YEAR STUDY [X];  
OVER 1 YEAR STUDY [ ]  
MP [X] EP [ ] EUP [ ] ACTION CODE 570  
DP BARCODE No.:361605 REG. No. 35935-38  
DECISION No.405723 MRID No(s): 476582-01  
PRODUCT NAME: DICAMBA ACID TECHNICAL  
COMPANY: NUFARM LIMITED

FROM:

William Herald *W Herald* *Sbm* 9/30/07  
Product Chemistry Team  
Technical Review Branch/RD (7505P)

TO:

Eugene Wilson / Joanne Miller, RM 23  
Herbicide Branch / RD (7505P)

I. CONCLUSIONS:

STORAGE STABILITY (830.6317):

[X] ACCEPTABLE  
[ ] UNACCEPTABLE\*  
[ ] UPGRADEABLE\*

40CFR158.190 DATA REQUIREMENT: [X] SATISFIED [ ] NOT SATISFIED

CORROSION CHARACTERISTICS (830.6320):

[X] ACCEPTABLE  
[ ] UNACCEPTABLE\*  
[ ] UPGRADEABLE\*

40CFR158.190 DATA REQUIREMENT: [X] SATISFIED [ ] NOT SATISFIED

\* If unacceptable or upgradeable describe the deficiency and provide recommendations

Comments & Recommendations

The report recites that the test was carried out in HDPE containers. However, there is nothing that can be found in the report or *supra* that specifies that the test container used in the study and the commercial container are of the same construction and material. For commercial purposes and storage, registrant is restricted to the container taught in the study to be compatible with the test substance.

## II. STUDY SUMMARY

### A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES

☒ Yes

☐ No

### B. PRODUCT INFORMATION

Active ingredient: Dicamba.

Label claims Nominal concentration (%): 98%

Initial concentration of the AI (%) used in the study: 98.11%

Lower certified limits (%) based on AI % in the study: 95.167%

### C. EXPERIMENTAL PARAMETERS

Temperature: Ambient laboratory conditions; storage location was dedicated to long-term storage studies; temperatures ranging between 21°C to 26°C .

Duration of study: 1 year

Type of container: 125mL HDPE containers.

Analysis at intervals: ☒ 0 (initial);

☒ 3 months; ☒ 6 months ☒ 9 months; ☒ 12 months

### D. ANALYTICAL METHOD

| Method                                     | DETECTOR       |
|--------------------------------------------|----------------|
| High Pressure Liquid chromatography (HPLC) | UV/VIS (250nm) |

### E. RESULTS

1. Compared to the initial concentration used in the study, the report shows that the AI% remained will within the statutory parameters required in Title 40 CFR § 158.350 during the 3<sup>rd</sup>, 6<sup>th</sup>, 9<sup>th</sup> and 12<sup>th</sup> month testing periods while stored at temperatures ranging between 21°C to 26°C.

2. There were no reported changes in the test substance (a light brown powder) at test initiation and throughout the course of the study. There were no signs of clumping, phase separation, or discoloration.

3. There were no reported adverse reactions involving the product with the 125mL HDPE containers. The containers showed no signs of cracking, fogging, discoloration, or distortion throughout the study. The mean total percent weight change observed in the 125mL HDPE containers was 0.2%  $\pm$  0.01%.

4. The analytical methods were evaluated for precision, linearity and accuracy.

The report recites that the test was carried out in HDPE containers. However, there is nothing that can be found in the report or *supra* that specifies that the test container used in the study, and the commercial container are of the same construction and material. For commercial purposes and storage, registrant is restricted to the container, to be used in the study to be compatible with the test substance.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

OCT 8 2009

Ms. Mary Beth Endres  
Regulatory Affairs Manager  
Nufarm Americas, Inc.  
150 Harvester Drive Suite 200  
Burr Ridge, IL 60527

Dear Ms. Endres:

SUBJECT: Dicamba Technical  
EPA Registration No. 35935-38  
Application and Letter Dated: January 28, 2009  
Request To Amend Registration To Comply with  
Notice of Pesticide Registration, Dated October 11,  
2007; Submission of Storage Stability and Corrosion  
Data, Assigned EPA MRID No 476582-01

Your application to amend the registration of "Dicamba Technical" by complying with the requirement for the submission of Storage and Corrosion Data has been reviewed and found acceptable under the Federal Insecticide, Fungicide and Rodenticide Act. A copy of the review, dated September 30, 2009, of the data identified by EPA MRID No. 476582-01 is enclosed for your records.

As stated in the review of the submitted data, the subject pesticide product must only be stored and shipped in HDPE containers. As the application to register this product does not name the composition and sizes of container that may be used in the shipping of this pesticide product, please submit a revised application within 30 days to reflect the container composition and package size(s) to be used in the shipment of this pesticide product.

Sincerely yours,

Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure

DATE OUT:

SUBJECT: STORAGE STABILITY (830.6317) & CORROSION CHARACTERISTICS  
(830.6320) REVIEW  
ACCELERATED STUDY ☐ ; ONE YEAR STUDY ☒;  
OVER 1 YEAR STUDY ☐  
MP ☒ EP ☐ EUP ☐ ACTION CODE 570  
DP BARCODE No.:361605 REG. No. 35935-38  
DECISION No.405723 MRID No(s): 476582-01  
PRODUCT NAME: DICAMBA ACID TECHNICAL  
COMPANY: NUFARM LIMITED

FROM: William Herald *W Herald* *Sbm* 9/30/07  
Product Chemistry Team  
Technical Review Branch/RD (7505P)

TO: Eugene Wilson / Joanne Miller, RM 23  
Herbicide Branch / RD (7505P)

I. CONCLUSIONS:

STORAGE STABILITY (830.6317):  
☒ ACCEPTABLE  
☐ UNACCEPTABLE\*  
☐ UPGRADEABLE\*

40CFR158.190 DATA REQUIREMENT: ☒ SATISFIED ☐ NOT SATISFIED

CORROSION CHARACTERISTICS (830.6320):  
☒ ACCEPTABLE  
☐ UNACCEPTABLE\*  
☐ UPGRADEABLE\*

40CFR158.190 DATA REQUIREMENT: ☒ SATISFIED ☐ NOT SATISFIED

\* If unacceptable or upgradeable describe the deficiency and provide recommendations

Comments & Recommendations

The report recites that the test was carried out in HDPE containers. However, there is nothing that can be found in the report or *supra* that specifies that the test container used in the study and the commercial container are of the same construction and material. For commercial purposes and storage, registrant is restricted to the container taught in the study to be compatible with the test substance.

## II. STUDY SUMMARY

### A. STUDY CONDUCTED UNDER US GLP/OECD GUIDELINES

☒ Yes  
☐ No

### B. PRODUCT INFORMATION

Active ingredient: Dicamba.

Label claims Nominal concentration (%): 98%

Initial concentration of the AI (%) used in the study: 98.11%

Lower certified limits (%) based on AI % in the study: 95.167%

### C. EXPERIMENTAL PARAMETERS

Temperature: Ambient laboratory conditions; storage location was dedicated to long-term storage studies; temperatures ranging between 21°C to 26°C .

Duration of study: 1 year

Type of container: 125mL HDPE containers.

Analysis at intervals: ☒ 0 (initial);

☒ 3 months; ☒ 6 months ☒ 9 months; ☒ 12 months

### D. ANALYTICAL METHOD

| Method                                     | DETECTOR       |
|--------------------------------------------|----------------|
| High Pressure Liquid chromatography (HPLC) | UV/VIS (250nm) |

### E. RESULTS

1. Compared to the initial concentration used in the study, the report shows that the AI% remained will within the statutory parameters required in Title 40 CFR § 158.350 during the 3<sup>rd</sup>, 6<sup>th</sup>, 9<sup>th</sup> and 12<sup>th</sup> month testing periods while stored at temperatures ranging between 21°C to 26°C.
2. There were no reported changes in the test substance (a light brown powder) at test initiation and throughout the course of the study. There were no signs of clumping, phase separation, or discoloration.
3. There were no reported adverse reactions involving the product with the 125mL HDPE containers. The containers showed no signs of cracking, fogging, discoloration, or distortion throughout the study. The mean total percent weight change observed in the 125mL HDPE containers was 0.2%  $\pm$  0.01%.
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The report recites that the test was carried out in HDPE containers. However, there is nothing that can be found in the report or *supra* that specifies that the test container used in the study, and the commercial container are of the same construction and material. For commercial purposes and storage, registrant is restricted to the container taught in the study to be compatible with the test substance.



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

|                                                                                                                                                                                                       |                                                                                                                                                                                          |                                                                                                            |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| 1. Company/Product Number<br>Dicamba Technical                                                                                                                                                        | 2. EPA Product Manager<br>Joanne Miller                                                                                                                                                  | 3. Proposed Classification<br><input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name)<br>35935-38                                                                                                                                                                 | PM#<br>23                                                                                                                                                                                |                                                                                                            |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Nufarm Americas, Inc.<br>105 Harvester Drive, Suite 200<br>Burr Ridge, IL 60527<br><br><input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:<br>EPA Reg. No. _____<br><br>Product Name _____ |                                                                                                            |

**Section - II**

|                                                                                |                                                                                        |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| <input type="checkbox"/> Amendment - Explain below.                            | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application.                                         |
| <input type="checkbox"/> Notification - Explain below.                         | <input checked="" type="checkbox"/> Other - Explain below.                             |

*Amendment*  
*1-28-09*

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of the Dicamba Technical storage stability (EPA OPPTS Guideline 830-6317) and corrosion characteristics (EPA OPPTS Guideline 830.6320) study in support of the registration.

**Section - III**

|                                                                                                                                                                     |                                                                               |                                                                                        |                                                                                                                                                                                          |                                                                                                                                   |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|--|
| 1. Material This Product Will Be Packaged In:                                                                                                                       |                                                                               |                                                                                        |                                                                                                                                                                                          | 2. Type of Container                                                                                                              |  |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes<br><input type="checkbox"/> No                                                                            | Unit Packaging<br><input type="checkbox"/> Yes<br><input type="checkbox"/> No | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input type="checkbox"/> No | <input type="checkbox"/> Metal<br><input type="checkbox"/> Plastic<br><input type="checkbox"/> Glass<br><input type="checkbox"/> Paper<br><input type="checkbox"/> Other (Specify) _____ |                                                                                                                                   |  |
| * Certification must be submitted                                                                                                                                   |                                                                               | If "Yes" Unit Packaging wgt. No. per container                                         | If "Yes" Package wgt. No. per container                                                                                                                                                  |                                                                                                                                   |  |
| 3. Location of Net Contents Information<br><input type="checkbox"/> Label <input type="checkbox"/> Container                                                        |                                                                               | 4. Size(s) Retail Container                                                            |                                                                                                                                                                                          | 5. Location of Label Directions<br><input type="checkbox"/> On Label<br><input type="checkbox"/> On Labeling accompanying product |  |
| 6. Manner in Which Label is Affixed to Product<br><input type="checkbox"/> Lithograph<br><input type="checkbox"/> Paper glued<br><input type="checkbox"/> Stenciled |                                                                               | <input type="checkbox"/> Other _____                                                   |                                                                                                                                                                                          |                                                                                                                                   |  |

**Section - IV**

|                                                                                                                                                                                                                                                                                    |                                        |                                                   |                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------|---------------------------------------------------|-------------------------------------------|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)                                                                                                                                      |                                        |                                                   |                                           |
| Name<br>Mary Beth Endres                                                                                                                                                                                                                                                           | Title<br>Regulatory Affairs Manager    | Telephone No. (Include Area Code)<br>630/455-2014 |                                           |
| <b>Certification</b><br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. |                                        |                                                   | 6. Date Application Received<br>(Stamped) |
| 2. Signature<br>                                                                                                                                                                                                                                                                   | 3. Title<br>Regulatory Affairs Manager |                                                   |                                           |
| 4. Typed Name<br>Mary Beth Endres                                                                                                                                                                                                                                                  | 5. Date<br>1/28/2009                   |                                                   |                                           |

27





476582-00

**Nufarm Americas Inc.**

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

www.us.nufarm.com

January 28, 2009

Ms. Joanne Miller (PM 23)  
Document Processing Desk  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
RoomS-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Subject: Dicamba Technical  
EPA Reg. No. 35935-38  
Submission of Storage Stability and Corrosion Characteristics Study

Dear Ms. Miller:

Enclosed with this letter are the following documents in support of the Credit Extreme Herbicide registration.

- Application for Pesticide Registration (EPA Form 8570-1)
- Transmittal Document (Volume 1 of 2)
- Three (3) copies of the storage stability and corrosion characteristics study (Volume 2 of 2).

Gravelle, M.S., William D. 2008. Storage Stability and Corrosion Characteristics of Nufarm NUP-06212 (EPA OPPTS Guidelines 830.6317 and 830.6320), performed by Eurofins | Product Safety Laboratories, Study Number 21773, October 2, 2008, 28 pages.

Please be aware that NUP-06212 and Dicamba Technical are the same formulation/product.

I can be contacted at 630/455-2011 if you should have any questions about this submission.

Best regards,

A handwritten signature in black ink, appearing to read 'Mary Beth Endres'.

Mary Beth Endres  
Regulatory Affairs Manager





**Nufarm Americas Inc.**  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
Telephone: (630) 455.2000 Facsimile: (630) 455.2001  
www.us.nufarm.com

## Transmittal Document

Volume 1 of 2

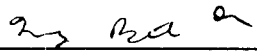
Dicamba Technical

EPA Reg. No. 35935-38

Storage Stability and Corrosion Characteristic Study

Company Name: Nufarm Limited

Company Agent: Mary Beth Endres

  
Signature

01-28-2009  
Date

Nufarm Limited  
105 Harvester Drive, Suite 200  
Burr Ridge, IL 60527



**Nufarm Americas Inc.**

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

www.us.nufarm.com

The following storage stability and corrosion characteristics study is being submitted in support of the Dicamba Technical (EPA Reg. No. 35935-38) registration.

Volume 1 of 2

Transmittal Document

Volume 2 of 2

**47658201** Gravelle, M.S., William D. 2008. Storage Stability and Corrosion Characteristics of Nufarm NUP-06212 (EPA OPPTS Guidelines 830.6317 and 830.6320), performed by Eurofins | Product Safety Laboratories, Study Number 21773, October 2, 2008, 28 pages.

Nufarm Limited

105 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Page 2 of 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

February 3, 2009

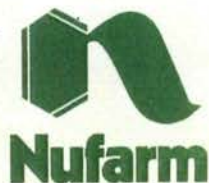
OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 30-JAN-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



Nufarm Americas, Inc.

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

www.us.nufarm.com

October 24, 2007

Document Processing Desk (FINLABEL)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: J. Miller, PM 23  
Herbicide Branch

Subject: Final Printed Label Dicamba Technical  
EPA Reg. No. 35935-38

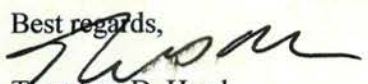
Dear Joanne:

Enclosed please find one copy of our final printed label in accordance with your letter dated October 11, 2007 and the results of our REDOX Study.

As a condition of registration Nufarm is required within 30 days to provide data on the dissociation constant for this product. The Dissociation Constant is discussed on page 14 under point number 9 (Discussion) of Volume Number 4 (MRID 47074503) of the data we had initially submitted. The lab had concluded that due to the low solubility of the dicamba in an aqueous solution no meaningful spectra were obtained that would enable the calculation of the pKa value. Please refer to this section for a more in-depth explanation on the dissociation constant of this product.

Should you have any questions or the need for additional information please do not hesitate to contact me at 630-455-2000 or via e-mail [ted.head@us.nufarm.com](mailto:ted.head@us.nufarm.com).

Best regards,

  
Theodore D. Head  
Product Registration Manager

# TRANSMITTAL DOCUMENT

**Name and Address**

Nufarm Limited.  
PO Box 13439  
104 T.W. Alexander Drive,  
Research Triangle Park, NC 27709

**Regulatory action in support of  
Which this package is submitted:**

Application for registration of the technical product  
Dicamba Technical

**EPA Reg. No./File Symbol:**

35935-38

**Transmittal Date:**

October 24, 2007

| <u>Volume No.</u> | <u>Citation</u>                                                                                                                                            | <u>MRID Number</u> |
|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| 1.                | Miller (2007) Oxidation / Reduction<br>OPPTS Guidelines 830.6302 – 830.7950<br>Unpublished study by Nufarm Limited<br>Study No. CHB-EX-453 15 Pages Total. | <u>47267101</u>    |

**Company Official:**

Theodore D. Head, Product Registration Manager

**Company Name:**

Nufarm Limited.

**Company Contact:**

Theodore D. Head

Phone: (630) 455-2000



|                                   |                                                                                                                |                                                         |                                   |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|-----------------------------------|
| (A)<br><b>EPA</b>                 | United States Environmental Protection Agency<br>Office of Pesticide Programs (H7505C)<br>Washington, DC 20460 | <input checked="" type="checkbox"/> <b>Registration</b> | OPP Identifier Number             |
|                                   |                                                                                                                | <input type="checkbox"/> <b>Amendment</b>               |                                   |
| <b>Application for Pesticide:</b> |                                                                                                                | <input type="checkbox"/> <b>Other</b>                   | Please Attach<br>An Original Form |

## Section I

|                                                                                                                                                                                                                    |                                                                                                                                                                                        |                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| 1. Company/Product Number<br>35935-38                                                                                                                                                                              | 2. EPA Product Manager<br>J. Miller                                                                                                                                                    | 3. Proposed Classification<br><input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name)<br>Dicmba Technical                                                                                                                                                                      | PM#<br>23                                                                                                                                                                              |                                                                                                            |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Nufarm Limited.<br>PO Box 13439<br>104 T.W. Alexander Drive,<br>Research Triangle Park, NC 27709<br><input type="checkbox"/> Check if this is a new address | 6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:<br><br>EPA Reg. No.<br><br>Product Name |                                                                                                            |

## Section II

|                                                                            |                                                                                                             |
|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Amendment - Explain Below                         | <input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <b>10-11-07</b> |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _ | <input type="checkbox"/> "Me Too" Application                                                               |
| <input type="checkbox"/> Notification - Explain below                      | <input type="checkbox"/> Other - explain below                                                              |

Explanation: Use additional page(s) if necessary. (For Section I and Section II).

Final Printed label

## Section III

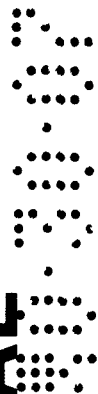
|                                                                                                                                                                                                                                                                                       |                                                                                                                                              |                                                                                                                                                  |                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. <b>Material This Product Will Be Packaged In:</b>                                                                                                                                                                                                                                  |                                                                                                                                              |                                                                                                                                                  |                                                                                                                                                                                                                             |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes*<br><input checked="" type="checkbox"/> No<br><br>*Certification must be submitted.                                                                                                                                         | Unit Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No<br><br>If "Yes," Unit Package Wt. No. Per Container | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No<br><br>If "Yes," Package Wt. No. Per Container | 2. Type of Container<br><input type="checkbox"/> Metal<br><input checked="" type="checkbox"/> Plastic<br><input type="checkbox"/> Glass<br><input type="checkbox"/> Paper<br><input type="checkbox"/> Other (Specify) _____ |
| 3. Location of Net Contents Information<br><input checked="" type="checkbox"/> Label or <input checked="" type="checkbox"/> Container                                                                                                                                                 |                                                                                                                                              | 4. Size(s) of Retail Container                                                                                                                   | 5. Location of Label Directions<br><input checked="" type="checkbox"/> On Label or<br><input checked="" type="checkbox"/> On Labeling accompanying product                                                                  |
| 6. Manner In Which Label Is Affixed To Product<br><input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other ( <u>Self-Adhesive Integrated Label/Booklet</u> )<br><input checked="" type="checkbox"/> Paper Glued<br><input type="checkbox"/> Stenciled |                                                                                                                                              |                                                                                                                                                  |                                                                                                                                                                                                                             |

## Section IV

|                                                                                                                                                                                                                                                                                    |                                                  |                                                     |                                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)                                                                                                                                      |                                                  |                                                     |                                                       |
| Name<br>Theodore D. Head                                                                                                                                                                                                                                                           | Title Product Registration Manager / Agriculture | Telephone No. (Include Area Code)<br>(708) 754-3330 |                                                       |
| <b>Certification</b><br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. |                                                  |                                                     | 6. Date Application Received<br><br>(Stamped)<br><br> |
| 2. Signature<br>                                                                                                                                                                                                                                                                   | 3. Title Product Registration Manager            |                                                     |                                                       |
| 4. Typed Name<br>Theodore D. Head                                                                                                                                                                                                                                                  | 5. Date<br>10-24-07                              |                                                     |                                                       |

# DICAMBA ACID TECHNICAL

FOR MANUFACTURING PURPOSES ONLY



## ACTIVE INGREDIENT:

Dicamba (3,6-dichloro-*p*-anisic acid) ..... 98.0%

OTHER INGREDIENTS: ..... 2.0%

TOTAL ..... 100.0%

EPA Reg. No. 35935-38

EPA Est. No. 082783-CHN-001

**KEEP OUT OF REACH OF CHILDREN**  
**DANGER**

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### DANGER

**CORROSIVE:** CAUSES IRREVERSIBLE EYE DAMAGE. HARMFUL IN SWALLOWED. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

#### FIRST AID

- |                     |                                                                                                                                                                                                                                                                                                                                                           |
|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>IF IN EYES</b>   | <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                    |
| <b>IF SWALLOWED</b> | <ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul> |

- |                               |                                                                                                                                                                                                                                      |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>IF ON SKIN OR CLOTHING</b> | <ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15 to 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul> |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

#### HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.

#### NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

## ENVIRONMENTAL HAZARDS

Keep out of lakes, streams or ponds. Do not contaminate water by the cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This technical material may only be used to produce formulations that are registered or exempted from registration by the U.S. EPA. If it is desired to produce formulations that do not have prior approval, the producer of such formulations is responsible for providing all necessary data and for obtaining registration.

Only for Formulation Into A Herbicide For (1) The Following Use(s): asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, lawns, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms; (2) Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) Uses for experimental purposes that are in compliance with U.S. EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

## STORAGE AND DISPOSAL (continued)

**CONTAINER DISPOSAL:** Plastic Bag: Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

## WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER. ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

## LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. BUYER'S OR USER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded. (RV101107)

NET CONTENTS: 1,763.7 lbs. (800 Kg)

Manufactured for:  
Nufarm Limited  
P.O. Box 13439  
RTP, NC 27709





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

October 31, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 30-OCT-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.





U.S. ENVIRONMENTAL PROTECTION  
AGENCY

Office of Pesticide Programs  
Registration Division (7505P)  
Ariel Rios Building  
1200 Pennsylvania Ave., NW  
Washington, D.C. 20460

EPA Reg. Number:

35935-38

Date of Issuance:

OCT 11 2007

NOTICE OF PESTICIDE:

☒ Registration

☐ Reregistration

(under FIFRA, as amended)

Term of Issuance: Conditional

Name of Pesticide Product:

Dicamba Acid Technical

Name and Address of Registrant (include ZIP Code):

Mr. Ted Head  
NUFARM, Ltd.  
P.O. Box 13439  
RTP, NC 27709

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A), provided that you make the following revisions:

1. Within 30 days from the date of this Notice of Registration, submit information on the oxidation/reduction potential of this product. This is required for a technical product unless sufficient information is provided to determine no oxidizers or reducers are present.
2. Within 30 days from the date of this Notice of Registration, submit information on the dissociation constant of this product.
3. Within 1 year from the date of this Notice of Registration:

EPA Guideline Number:

830.6317

830.6320

Study Description:

Storage Stability

Corrosion Characteristics

4. Submit and/or cite all data required for the registration of this product when the Agency requires all registrants of similar product to submit data.
5. Add the statement, "EPA Reg. No.35935-38."
6. Submit one copy of the final printed label before the product is released for shipment

A stamped copy of the label is enclosed for your records

Signature of Approving Official:

Kathryn V. Montague  
Acting Product Manager 23  
Herbicide Branch  
Registration Division (7505P)

Date:

OCT 11 2007

# DICAMBA ACID TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

**ACTIVE INGREDIENT:**

Dicamba (3,6-dichloro-p-anisic acid) ..... 98%

**OTHER INGREDIENTS:** ..... 2%

**TOTAL:** ..... 100%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

EPA REG. NO.  
EPA EST. NO.

OCT 11 2007  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

MANUFACTURED FOR  
NUFARM INC.  
BURR RIDGE, IL 60527



NET CONTENTS

35935-38

000000-00000.20061219.

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS  
DANGER**

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

| FIRST AID                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IF IN EYES                                                                                                                                                                                                                      | <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                       |
| IF SWALLOWED                                                                                                                                                                                                                    | <ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul> |
| IF ON SKIN<br>OR CLOTHING                                                                                                                                                                                                       | <ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                                                                                         |
| <b>HOT LINE NUMBER</b><br>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information. |                                                                                                                                                                                                                                                                                                                                                           |
| <b>NOTE TO PHYSICIAN</b><br>Probable mucosal damage may contraindicate the use of gastric lavage.                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                           |

**ENVIRONMENTAL HAZARDS**

Keep out of lakes, streams or ponds. Do not contaminate water by the cleaning of equipment or disposal of wastes. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This technical material may only be used to produce formulations that are registered or exempted from registration by the U.S. EPA. If it is desired to produce formulations that do not have prior approval, the producer of such formulations is responsible for providing all necessary data and for obtaining registration.

Only for Formulation Into A Herbicide For (1) The Following Use(s): Asparagus, corn, fallow systems, grass forage, fodder and hay (including grasses grown for seed), millet, small grains (barley, oats, wheat), sorghum (including sudangrass), soybeans, sugarcane, cotton, pasture and rangeland, Conservation Reserve Program Areas, farmsteads, fence rows, lawns, non-irrigation ditchbanks, rights-of-way, roadsides, turf and sod farms; (2) Uses for which the U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and (3) Uses for experimental purposes that are in compliance with U.S. EPA regulations.

This product may be used to formulate products for specific uses not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA data submission requirements regarding support of such uses.

The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.

### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**CONTAINER DISPOSAL:** Plastic Bag: Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

### WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. **THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER.** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, **MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE.** UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO CROP INJURY OR INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

### LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR ARISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

(RV121906)

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

## Certification with Respect to Citation of Data

|                                                                                                                                                                                                    |                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| Applicant's/Registrant's Name, Address, and Telephone Number<br>Nufarm Limited.<br>PO Box 13439<br>104 T.W. Alexander Drive,<br>Research Triangle Park, NC 27709<br>Telephone (630) 455-2000       | EPA Registration Number/File Symbol<br>35935 <del>or</del> 38 |
| Active Ingredient(s) and/or representative test compound(s)<br>Dicamba (3,6-dichloro-o-anisic acid)                                                                                                | Date<br>See Section III                                       |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Appendix A)<br>Terrestrial food crop, terrestrial nonfood crop, forestry, aquatic noncrop, domestic outdoor. | Product Name<br>Dicamba Technical                             |

**NOTE:** If your product is a 100% repackaging of another EPA-registered product labeled for the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose.)

## SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☒ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☐ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

## SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements).

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

## SECTION III: CERTIFICATION


I certify that this application for registration, this form for reregistration, or this Data Call-In response is supported by all data submitted or cited in the application for registration, the form for registration, or the Data Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(8) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements that I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

|                                                                                                 |                  |                                                                                     |
|-------------------------------------------------------------------------------------------------|------------------|-------------------------------------------------------------------------------------|
| Signature<br> | Date<br>10-10-07 | Typed or Printed Name and Title<br>Theodore D. Head<br>Product Registration Manager |
|-------------------------------------------------------------------------------------------------|------------------|-------------------------------------------------------------------------------------|

EPA Form 8570-34 (Rev. 9-97) Electronic and Paper versions available. Submit only Paper version.

CHEMICAL NAME 029801 Dicamba September 30, 2007 Edition

SYNGENTA CROP PROTECTION, INC.  
ATTN: REGULATORY AFFAIRS  
PO BOX 18300  
GREENSBORO, NC 27419

BASF CORPORATION  
PO BOX 13528  
RESEARCH TRIANGLE PARK, NC 27709

MONSANTO CO  
Agent for: MONSANTO COMPANY  
1300 I STREET, NW, SUITE 450 EAST  
WASHINGTON, DC 20005

SCOTTS COMPANY, THE  
14111 SCOTTS LAWN RD  
MARYSVILLE, OH 43041

PBI/GORDON CORP  
PO BOX 014090  
KANSAS CITY, MO 64101

BASF CORPORATION  
AGRICULTURAL PRODUCTS  
PO BOX 13528  
RESEARCH TRIANGLE PARK, NC 27709

CHEMSICO  
DIV OF UNITED INDUSTRIES CORP  
PO BOX 142642  
ST LOUIS, MO 63114

LOVELAND PRODUCTS, INC.  
PO BOX 1286  
GREELEY, CO 80632

ALBAUGH, INC  
Agent for: ALBAUGH INC  
PO BOX 2127  
VALDOSTA, GA 31604

DOW AGROSCIENCES LLC  
9330 ZIONSVILLE RD 308/2E  
INDIANAPOLIS, IN 46268

SPRAY DRIFT TASK FORCE  
1900 K STREET, NW

GHARDA USA, INC  
NEWTOWN-YARDLEY RD., SUITE 105  
NEWTOWN, PA 18940

OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE, L.L.C.  
1350 I STREET, N.W.  
WASHINGTON, DC 20005

AGRICULTURAL REENTRY TASK FORCE  
1350 I STREET, N.W.  
WASHINGTON, DC 20005

BAYER ADVANCED  
A BUSINESS UNIT OF BAYER CROPSCIENCE LP  
PO BOX 12014  
RESEARCH TRIANGLE PARK, NC 27709

FIFRA ENDANGERED SPECIES TASK FORCE, L.L.C.  
1350 I STREET, NW  
WASHINGTON, DC 20005

RESIDENTIAL EXPOSURE JOINT VENTURE (REJV)  
900 17TH STREET, NW, SUITE 300  
WASHINGTON, DC 20006

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE  
PO BOX 509  
MACON, MO 63552

LIBERTAS NOW, INC.  
419 FOURTH STREET  
ANNAPOLIS, MD 21403

BIOLOGIC, INC.  
Agent for: AXSS USA, LLC  
115 OBTUSE HILL ROAD  
BROOKFIELD, CT 06804



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

SEP 13 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Ted Head  
NUFARM Ltd.  
P.O. Box 13439  
RTP, NC 27709

Dear Mr. Head:

Subject: Dicamba Technical  
EPA File Symbol No.35935-GI  
Submission dated March 2, 2007

The application referred to above has been determined, pursuant to 40 CFR 152.105, not to be sufficiently complete to process; therefore, the application is considered deficient. Labeling/other information as specified below must be submitted before the processing of the application can be completed. If such deficiencies cannot be corrected within 75 days, you must notify the Agency within those 75 days of the date you expect to complete the application. If, after 75 days, you do not respond, or your subsequently fail to complete the application within the scheduled times of completion, the Agency will terminate any action on the application, and will treat the application as if it has been withdrawn by the applicant. Any subsequent submission relating to the application must be submitted as a new application.

1. Product chemistry data submitted for this product is deficient. Studies on the following topics were not submitted:
  - a. Oxidation/Reduction, 830.6314. This is required for a technical product unless sufficient information is provided to determine no oxidizers or reducers are present. This information was not provided in the manufacturing process data that were submitted; therefore, an oxidation/reduction study is required.
  - b. Dissociation Constant, 830.7370.
2. A signed Certification with Respect to Data Citation form (8570-34) and Offers to Pay have not been submitted.

If you have any questions, please contact Kathryn Montague at 703-305-1243.

Sincerely,

A handwritten signature in blue ink that reads "Joanne I. Miller".

Joanne I. Miller  
Product Manager 23  
Herbicide Branch  
Registration Division (7505P)



FEE

DATE: 08/16/07

SUBJECT: Product Chemistry Review of DICAMBA TECHNICAL

FROM: Indira Gairola <sup>(d)</sup> 09/15/07  
Product Chemistry Team  
Technical Review Branch/RD (7505P)

SBM 915707

TO: Joanne Miller/Kathryn Montague PM 23  
Herbicide Branch/RD (7505P)

DP BARCODE No.: 338483

File Symbol No.: 35935-GI

COMPANY: NUFARM LIMITED

PCC: 029801

Decision No. 376508

Chemical Name: (IUPAC, ANSI, etc.) Dicamba

CAS No. 1918-00-9

USE: Herbicide

#### INTRODUCTION:

NUFARM LIMITED has submitted Product Chemistry Guideline reference 830 Subgroup A & B data to support the registration of DICAMBA TECHNICAL. Details are listed below:

#### SUMMARY OF FINDINGS:

1. Applicant NUFARM LIMITED has submitted MRID#s 470745-01,-02,-03 &-04 for Product Chemistry data to support the registration of DICAMBA TECHNICAL.
2. The submitted package was reviewed and details of product chemistry data will be discussed in the following Pages:
3. The Basic Formulation CSF dated 03/07/07 is filled out completely and correctly.
4. The certified limits are in compliance with 40 CFR158 .175 (b) (2).
5. Average recovery of DICAMBA TECHNICAL ranged from acceptable level of 98.63%-100.14% Mean Average =99.18%.

CONCLUSIONS :

TRB has reviewed the product chemistry data submitted for the above mentioned subject product and has concluded that:

1. Product Chemistry data requirements for subgroup A are satisfactory and fulfill the requirement of OPP test guidelines.
2. Certified limits are in compliance with 40CFR.175 (b) (2). See CONFIDENTIAL APPENDIX.
3. Average recovery of DICAMBA TECHNICAL ranged from acceptable level of 98.63%-100.14% Mean Average =99.18%.
4. The Basic Formulation CSF dated 03/07/07 is acceptable.
5. Product Chemistry data requirements for subgroup B do not completely fulfill the requirement of OPP test guidelines. Following are the deficiencies noted:
  - a) 830.6314- Oxidation/Reduction
  - b) 830.7370 - Dissociation Constant

Applicant needs to fulfill all the deficiencies stated.

**Sub Group 'A' Guidelines Series 830.1550-1800**  
**DP BAR CODE: 338483 File Symbol No.: 35935-GI**  
**PRODUCT NAME: DICAMBA TECHNICAL**

| Table 1:Manufacturing and Impurity Data for DICAMBA TECHNICAL                                                                           |                                              |      |                     |                                        |
|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|------|---------------------|----------------------------------------|
| GLN                                                                                                                                     | Requirement                                  | MRID | Status <sup>1</sup> | Details and/or Deficiency <sup>2</sup> |
| 830.1550                                                                                                                                | Product Identity & Disclosure of Ingredients |      | A                   | 03/07/07                               |
| 830.1600<br>830.1620<br>830.1650                                                                                                        | Starting Materials & Manufacturing Process   |      | A                   | MRID # 470745-01                       |
| 830.1670                                                                                                                                | Discussion of Impurities                     |      | A                   | MRID # 470745-01                       |
| 830.1700                                                                                                                                | Preliminary Analysis                         |      | A                   | MRID # 470745-02                       |
| 830.1750                                                                                                                                | Certification of Limits                      |      | A                   | 03/07/07                               |
| 830.1800                                                                                                                                | Analytical Methods                           |      | A                   | MRID # 470745-01                       |
| <sup>1</sup> A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not Applicable. <sup>2</sup> Refer to CBI Appendix A for details. |                                              |      |                     |                                        |

**Sub Group 'B' Guidelines Series 830.1550-1800**  
**DP BAR CODE: 338483 File Symbol No.: 35935-GI**  
**PRODUCT NAME: DICAMBA TECHNICAL**

| Table 2: Physical and Chemical Properties for DICAMBA TECHNICAL EPA REG. NO.: 35935-GI              |                                         |           |                     |                                                                                               |
|-----------------------------------------------------------------------------------------------------|-----------------------------------------|-----------|---------------------|-----------------------------------------------------------------------------------------------|
| GLN                                                                                                 | Requirement                             | MRID.     | Status <sup>1</sup> | Result <sup>2</sup> or Deficiency                                                             |
| 830.6302                                                                                            | Color                                   | 470745-03 | A                   | Light brown                                                                                   |
| 830.6303                                                                                            | Physical State                          | 470745-03 | A                   | Solid (powder)                                                                                |
| 830.6304                                                                                            | Odor                                    | 470745-03 | A                   | Faint                                                                                         |
| 830.6313                                                                                            | Stability                               | 470745-03 | A                   | Stable on contact with Fe powder, Fe acetate Al powder and Al acetate@ 54°C and ambient temp. |
| 830.631 4                                                                                           | Oxidation / Reduction                   |           |                     | Not stated                                                                                    |
| 830.6315                                                                                            | Flammability                            | NA        | NA                  | Not flammable                                                                                 |
| 830.6316                                                                                            | Explosibility                           |           | A                   | Not explosive                                                                                 |
| 830.6317                                                                                            | Storage Stability                       | NA        | NA                  |                                                                                               |
| 830.6319                                                                                            | Miscibility                             | NA        | NA                  |                                                                                               |
| 830.6320                                                                                            | Corrosion Characteristics               | NA        | NA                  |                                                                                               |
| 830.7000                                                                                            | pH                                      | 470745-03 | A                   | 2.53                                                                                          |
| 830.7050                                                                                            | UV/Visible Absorption                   | 470745-03 | A                   | Neutral -207value 30426.2, Acidic- 207@22473.6 , Alkaline 220.0value =12038.7                 |
|                                                                                                     | Viscosity                               | NA        | NA                  |                                                                                               |
| 830.7200                                                                                            | Melting Point/ Melting Range            | 470745-03 | A                   | 112.8±0.4°C                                                                                   |
| 830.7220                                                                                            | Boiling Point/ Boiling Range            | NA        | NA                  |                                                                                               |
| 830.7300                                                                                            | Density/ Relative Density/ Bulk Density | 470745-03 | A                   | Pour 0.644±0.01006g/mL<br>Tap 0.799±0.006g/mL                                                 |
| 830.7370                                                                                            | Dissociation Constant in Water          |           |                     | Not stated                                                                                    |
| 830.7550                                                                                            | Partition Coefficient (Octanol/Water)   | 470745-03 |                     | 0.768 ±0.012 ( log P <sub>ow</sub> )                                                          |
| 830.7840                                                                                            | Solubility                              | 470745-03 |                     | 7.09 ± 0.03g/L                                                                                |
| 830.7950                                                                                            | Vapor Pressure                          | 470745-04 |                     | 3.4x10 <sup>-3</sup> Pa@25 °C                                                                 |
| <sup>1</sup> A = Acceptable; N = Unacceptable (see Deficiency); N/A = Not applicable, I= incomplete |                                         |           |                     |                                                                                               |

PRODUCT IDENTITY AND COMPOSITION (OPPTS 830.1550)

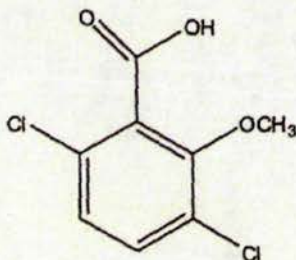
NUP-06212 is the current product name of a technical grade active ingredient containing 3, 6-Dichloro-2-methoxybenzoic acid (commonly known as Dicamba acid). An MSDS for NUP-06212 is attachment 1 to this volume.

NUP-06212 contains 98% Dicamba acid and associated process impurities which are identified and quantified in the preliminary analysis of five batches study submitted in a separate volume with this submission. The source of NUP-06212 is shown on the Confidential Statement of Formula as attachment 1 in the confidential appendix.

Test Article: NUP-06212 – 98% Dicamba Technical Acid

Active Ingredient Identity:

|                    |                                                                           |
|--------------------|---------------------------------------------------------------------------|
| CAS No.:           | 1918-00-9                                                                 |
| Common name/alias: | Dicamba                                                                   |
| Chemical Names:    |                                                                           |
| IUPAC:             | 3,6-dichloro- <i>o</i> -anisic acid or 3,6-dichloro-2-methoxybenzoic acid |
| CAS:               | 3,6-dichloro-2-methoxybenzoic acid                                        |
| Molecular formula: | $C_8H_6Cl_2O_3$                                                           |
| Molecular weight:  | 221                                                                       |
| Structure:         |                                                                           |



## **SUB GROUP A**

### **I MANUFACTURING PROCESS (830.1620):**

For details please refer to the CONFIDENTIAL APPENDIX.

### **II DISCUSSION OF FORMATION OF IMPURITIES (830.1670):**

This portion will be discussed in CONFIDENTIAL APPENDIX

### **III PRELIMINARY ANALYSES 830.1700 not submitted.**

### **1V CERTIFIED LIMITS**

Please refer to the CONFIDENTIAL APPENDIX for CSF.

### **V. ENFORCEMENT ANALYTICAL METHOD (830.1800)**







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

*File 007*

April 13, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT  
Or Pay On-Line at [www.Pay.Gov](http://www.Pay.Gov) (See Below for Details)

OPP Decision Number: D-376508  
EPA File Symbol or Registration Number: 35935-GI  
Product Name: DICMBA TECHNICAL  
EPA Receipt Date: 08-Mar-2007  
EPA Company Number: 35935  
Company Name: NUFARM LIMITED

Ted Head  
NUFARM LIMITED  
NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee -- Revised

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action previously identified as R33 has been reclassified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT  
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ 4,200 to:

By USPS:  
USEPA Washington Finance Center  
Pesticide Registration Service Fee  
PO Box 360277  
Pittsburgh, PA 15251

**By Courier:**

U.S. EPA Washington Finance Center  
Pesticide Registration Service Fee  
C/O Mellon Client Service Center  
500 Ross Street, Room 670  
Box 360277  
Pittsburgh, PA 15251-6277  
Attn: EPA Module Supervisor  
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit [www.pay.gov](http://www.pay.gov). From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at [www.epa.gov/pesticides/fees](http://www.epa.gov/pesticides/fees).

Please send Registration Service Fee Waiver requests to:

**By USPS:**

Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

**By Courier:**

Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room S4900 Potomac Yard 1  
2777 S. Crystal Dr.  
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee

Ombudsman at (703) 305-6249.

Sincerely,

Front End Processing Staff  
Information Technology & Resources Management Division



Linda  
Arrington/DC/USEPA/US  
04/13/2007 08:28 AM

To John Jamula/DC/USEPA/US@EPA, Joanne  
Miller/DC/USEPA/US@EPA  
cc  
bcc  
Subject Fw: Registration Application Subject to Registration Service  
Fee EPA File Symbol 35935-GI

JJ,

Please revise the bill for 35935-GI from R33 to R31 as company has provided the correct documentation.  
Thanks.

Linda Arrington  
Registration Division  
703 305 6249  
703 305 6920 (fax)

—— Forwarded by Linda Arrington/DC/USEPA/US on 04/13/2007 08:29 AM ——



Ted.Head@us.nufarm.com  
04/05/2007 05:53 PM

To Linda Arrington/DC/USEPA/US@EPA  
cc Joanne Miller/DC/USEPA/US@EPA  
Subject Re: Fw: Registration Application Subject to Registration  
Service Fee EPA File Symbol 35935-GI

Linda:  
Thanks for the clarification. Attached is a signed 8570-34 using the cite  
all method. I trust that this will allow the Agency to change the PRIA  
code from R33 to an R31. Please let me know if there is anything further I  
need to do! I would also like to know as soon as possible when the PRIA  
code and fee is changed so I can submit my payment via pay.gov.

Again thanks for your help and hope I wasn't to much trouble.

Regards,

Ted Head  
Nufarm Americas Inc.  
Product Registration Manager

(See attached file: scanned 8570-34 (4-4-07).pdf)

THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO  
WHICH IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED,  
CONFIDENTIAL AND EXEMPT FROM DISCLOSURE. If the reader of this message is  
not the intended recipient, you are hereby notified that any dissemination,  
distribution, or copying of this communication is strictly prohibited. If  
you have received this communication in error, please delete, destroy, and  
do not save the message. Nufarm Americas Inc. and it's affiliated  
companies.

Arrington.Linda@e

pamail.epa.gov

03/30/2007 01:53  
PM

Ted.Head@us.nufarm.com

To

milller.joanne@epa.gov

cc

Subject

Re: Fw: Registration Application  
Subject to Registration Service Fee  
EPA File Symbol 35935-GI

Hi Ted,

I understand where you are coming from, however RD has been consistent in our asking for the signed certification form in order to assign the appropriate PRIA. Prior to PRIA all the regulatory divisions followed the policy you mentioned in your email. However since PRIA and working with OGC, the regulatory division are in agreement that without the signed certification form we will assign the higher fee category. The unsigned form you sent would not be legally binding to the Agency.

I am in the office until 5:30 pm Eastern so please feel free to give me a call.

Linda Arrington  
Registration Division  
703 305 6249  
703 305 6920 (fax)

Ted.Head@us.nufarm.com

03/26/2007 04:34  
PM

Linda Arrington/DC/USEPA/US@EPA

To

Joanne Miller/DC/USEPA/US@EPA

cc

Subject

Re: Fw: Registration Application  
Subject to Registration Service  
Fee EPA File Symbol 35935-GI

Linda:

I have tried calling but seems that your a pretty busy person. In

response  
to your email below we have discussed this internally at Nufarm and believe this to be a departure from what the Agency has previously accepted. Several years ago the Agency instituted a policy to foster consistency among product managers in the Registration Division in applying this regulation. Under that policy, applicants who defer their offers to pay and certification with respect to citation of data must provide a "Notice of Intent to Apply" to relevant companies on the data submitters list. This is what we have done with this application.

Specifically 40 CFR 1582.84 When Materials must be submitted to the Agency, " All information required by this subpart should be submitted with the application, but may be submitted at any time prior to the EPA's approval of the application." 40 CFR 152.86 (b)(2)(i) specifically mentions the Notice of Intent to Apply.

Nufarm fully agrees with your statement that the 8570-34 is not valid unless signed. However, as previously mentioned, at such a time that the review has been completed and a decision to register has been reached, Nufarm will submit the Offer to Pay letters to the same data submitters that received the Notice of Intent to Apply as well as submitting to the Agency a signed Certification with Respect to Citation of Data.

With the revised Certification with Respect to Data Citation now showing the cite all method of support I am again respectfully requesting that the PRIA Code be changed from R33, New Manufacturing Use Product, Old AI, Selective Citation to R31, New Product, Non-fast track (includes reviews of product chemistry, acute toxicity, public health pest efficacy).

I sincerely hope you know that I am not trying to be difficult in this situation but I do need to know if the Agency has changed it's policy regarding when materials have to be submitted as well as when the Offer to Pay has to be submitted.

Respectfully,

Ted Head  
Nufarm Americas Inc.  
Product Registration Manager

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Arrington.Linda@e

pamail.epa.gov

To

03/22/2007 12:09

Ted.Head@us.nufarm.com

PM

cc

milller.joanne@epa.gov

Subject

Re: Fw: Registration Application

Subject to Registration Service

Fee

EPA File Symbol 35935-GI

Hi Ted,

Per OGC the form is not valid if it is not signed. It is similar to an "intent to offer to pay" which is also not valid for us to use per OGC. Therefore in order to change the category I need a signed OTP and hopefully a data matrix (my assumption is that the matrix was included in the application.)

Linda Arrington  
Registration Division  
703 305 6249  
703 305 6920 (fax)

Ted.Head@us.nufarm.com

03/21/2007 03:23  
PM

To  
Linda Arrington/DC/USEPA/US@EPA  
cc  
Joanne Miller/DC/USEPA/US@EPA  
Subject  
Re: Fw: Registration Application  
Subject to Registration Service  
Fee EPA File Symbol 35935-GI



Linda:

My apologizes, I submitted a blank 8570-34 instead of what was on my computer. Please note that at such time as this registration application has completed review and a decision to register has been reached by the Agency please contact me and we will issue the offer to pay letters as appropriate as well as a signed 8570-34.

Regards,

Ted Head  
Nufarm Americas Inc.  
Product Registration Manager

(See attached file: 8570-34 (3-2-07).doc)

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Arrington.Linda@e  
pamail.epa.gov

To 03/21/2007 12:52 PM Ted.Head@us.nufarm.com

cc miller.joanne@epa.gov

Subject Re: Fw: Registration Application

Fee Subject to Registration Service

EPA File Symbol 35935-GI

Hi Ted,

I looked over your application and although you said you were doing a cite all with product specific data only, the data compensation form is not completely filled out. Therefore we had no choice but to give the action a R33. If you provide a completed form to Joanne no later than tomorrow, we will be able to change the code. After tomorrow Joanne will be out for 2 weeks.

Take care.

Linda Arrington  
Registration Division  
703 305 6249  
703 305 6920 (fax)

Ted.Head@us.nufarm.com

03/21/2007 11:39 AM

To  
Linda Arrington/DC/USEPA/US@EPA  
cc  
Joanne Miller/DC/USEPA/US@EPA  
Subject  
Re: Fw: Registration Application  
Subject to Registration Service  
Fee EPA File Symbol 35935-GI

Linda:  
Would like to pay and get the PRIA clock rolling on this, can give me any guidance on how to go about changing the PRIA code.

Thanks,

Ted Head  
Nufarm Americas Inc.  
Product Registration Manager

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dissemination,  
distribution, or copying of this communication is strictly prohibited.  
If  
you have received this communication in error, please delete, destroy,  
and  
do not save the message. Nufarm Americas Inc. and it's affiliated  
companies.

Ted

Head/US/Nufarm

To 03/16/2007 01:21 arrington.linda@epa.gov

PM

cc miller.joanne@epa.gov

Subject Fw: Registration Application

Fee Subject to Registration Service

EPA File Symbol 35935-GI

Linda:

I received this PRIA fee email wherein the application was coded as a R33.

I have indicated in the cover letter that this is a cite all and that studies submitted were product specific. I have submitted 4 other technical products in the past 12 months and all have been coded as R31. Difference in fees between the two codes are \$11,550.

I think there may have been a coding error on this technical. Can you please check into this and let me know how I should proceed in getting the PRIA code changed.

Thanks,

Ted Head  
Nufarm Americas Inc.  
Product Registration Manager

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do not save the message. Nufarm Americas Inc. and it's affiliated  
companies.

----- Forwarded by Ted Head/US/Nufarm on 03/16/2007 01:15 PM -----

Pesticide  
Registration  
Improvement Act  
To <Pesticide\_Regist ted.head@us.nufarm.com  
ration@epamail.ep  
cc a.gov>  
Sent by:  
Subject DCOPPAPPS01/DC/US Registration Application Subject  
to EPA/US@epamail.epa Registration Service Fee  
a.gov

03/09/2007 10:24

AM

Please respond to  
Pesticide\_Registr  
ation@epamail.epa  
.gov

March 9, 2007  
OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES  
PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT  
Or Pay On-Line at [www.Pay.Gov](http://www.Pay.Gov) (See Below for Details)

OPP Decision Number: D-376508  
EPA File Symbol or Registration Number: 35935-GI  
Product Name: DICMBA TECHNICAL  
EPA Receipt Date: 08-Mar-2007  
EPA Company Number: 35935  
Company Name: NUFARM LIMITED

WILLIAM M. MAHLBURG  
NUFARM LIMITED  
NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R33

NEW MANUFACTURING USE PRODUCT;OLD AI;SELECTIVE CITATION;

Please remit payment in the amount of: \$ 15,750 to:

By USPS:

USEPA Washington Finance Center  
Pesticide Registration Service Fee  
PO Box 360277  
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center  
Pesticide Registration Service Fee  
C/O Mellon Client Service Center  
500 Ross Street, Room 670  
Box 360277  
Pittsburgh, PA 15251-6277  
Attn: EPA Module Supervisor  
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit [www.pay.gov](http://www.pay.gov). From the [pay.gov](http://pay.gov) home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you

receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at [www.epa.gov/pesticides/fees](http://www.epa.gov/pesticides/fees).

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
Programs (7504C)

U.S. Environmental Protection Agency  
Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

By Courier:

Document Processing Desk (WAIVER)  
Office of Pesticide

U.S. Environmental

Room S4900 Potomac Yard 1  
2777 S. Crystal Dr.  
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,

Front End

Information

Processing Staff

Technology & Resources Management Division

(See attached file: 8570-34 (3-2-07).doc) [attachment "8570-34 (3-2-07).doc" deleted by Ted Head/US/Nufarm]



scanned 8570-34 (4-4-07).pdf

**Fees For Service Screen  
35935-GI**

The Administrative Paperwork is not complete. The Certification with Respect to Citation of Data, EPA Form 8570-34 is blank. The completed and signed form must be submitted. This product does not qualify for the formulator's exemption for their source of active ingredient; a new unregistered source of active ingredient.

This submission is not complete enough to start review of the product chemistry data or route to the Acute Toxicity Similarity Clinic because the currently registered substantially similar me-too product was not cited in box 6 of the application form or on the cover letter.





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460**

March 9, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

**PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT  
Or Pay On-Line at [www.Pay.Gov](http://www.Pay.Gov) (See Below for Details)**

OPP Decision Number: D-376508  
EPA File Symbol or Registration Number: 35935-GI  
Product Name: DICMBA TECHNICAL  
EPA Receipt Date: 08-Mar-2007  
EPA Company Number: 35935  
Company Name: NUFARM LIMITED

WILLIAM M. MAHLBURG  
NUFARM LIMITED  
NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

**SUBJECT: Receipt of Registration Application Subject to Registration Service Fee**

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Pesticide Registration Service Fee  
PO Box 360277  
Pittsburgh, PA 15251

**By Courier:**

U.S. EPA Washington Finance Center  
Pesticide Registration Service Fee  
C/O Mellon Client Service Center  
500 Ross Street, Room 670  
Box 360277  
Pittsburgh, PA 15251-6277  
Attn: EPA Module Supervisor  
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

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You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at [www.epa.gov/pesticides/fees](http://www.epa.gov/pesticides/fees).

Please send Registration Service Fee Waiver requests to:

**By USPS:**

Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave NW  
Washington, DC 20460

**By Courier:**

Document Processing Desk (WAIVER)  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room S4900 Potomac Yard 1  
2777 S. Crystal Dr.  
Arlington, VA 22202

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If you have any questions, please contact the Pesticide Registration Service Fee

Ombudsman at (703) 305-6249.

Sincerely,

*Teresa Downs*

Front End Processing Staff  
Information Technology & Resources Management Division

# Fee for Service

{806504È~

This package includes the following

☒ New Registration

☐ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

23

Receipt No.

S-

806504

EPA File Symbol/Reg. No.

35935-GI

Pin-Punch Date:

3/8/2007

☐ This item is NOT subject to FFS action.

## Action Code:

Requested:

R31

Granted:

R33

Amount Due: \$ 15,750

## Parent/Child Decisions:

Reviewer:

*[Signature]*

Date:

3/9/07

Remarks:

*Coner ltr says "Cite-all" but Data Comp form is blank.*



## Nufarm Americas, Inc.

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

www.us.nufarm.com

March 2, 2007

Document Processing Desk (REG FEE)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: J. Miller, PM 23  
Herbicide Branch

Subject: Application for Registration  
Dicamba Technical  
EPA Reg. No. 35935-[Pending]

Dear Joanne:

Enclosed is our application for registration of Dicamba Technical. We have chosen the cite-all method of data support and I am providing a list of companies that have been sent Notices of Intent to apply for Registration. Product specific studies submitted are itemized on the transmittal document. All EPA administrative forms are listed on the transmittal document and are contained in Volume 1 of the submission.

Nufarm believes that this submission falls within Fee For Service Category R31, New Product Non-Fast Track with a 6 month review and \$4200 fee.

Should you have any questions or the need for additional information please do not hesitate to contact me at 630-455-2000 or via e-mail [ted.head@us.nufarm.com](mailto:ted.head@us.nufarm.com).

Best regards,

  
Theodore D. Head

Product Registration Manager

# TRANSMITTAL DOCUMENT

**Name and Address**

Nufarm Limited.  
PO Box 13439  
104 T.W. Alexander Drive,  
Research Triangle Park, NC 27709

**Regulatory action in support of  
Which this package is submitted:**

Application for registration of the technical product  
Dicamba Technical

**EPA Reg. No./File Symbol:**

35935-[Pending]

**Transmittal Date:**

March 2, 2007

**Volume No. 1, Administrative Material:**

|                  |                                                |
|------------------|------------------------------------------------|
| EPA Form 8570-1  | Application for Pesticide Registration         |
| EPA Form 8570-4  | Confidential Statement of Formula              |
| EPA Form 8570-34 | Certification with Respect to Citation of Data |
| EPA Form 8570-35 | Data Matrix                                    |
|                  | Proposed Labeling                              |

| <u>Volume No.</u> | <u>Citation</u>                                                                                                                                                                                                                                                   | <u>MRID Number</u> |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|
| 2.                | Cooke (2007) Product Chemistry Requirements<br>for Nufarm Dicamba Technical NUP 06212, OPPTS Sections<br>830.1550, 830.1600, 830.1620, 830.1670, 830.1750<br>830.1800 Unpublished study by Nufarm<br>Study No. RTP-07-006-REG 143 Pages Total.                    | <b>47074501</b>    |
| 3.                | Sheehy (2007) Preliminary Analysis,<br>for Dicamba Technical NUP 06212, OPPTS Sections 830.1700<br>Unpublished study by Product Safety Labs<br>Study # 20809 Pages 39.                                                                                            | <b>47074502</b>    |
| 4.                | Li (2007) Physical/Chemical Properties<br>for Dicamba Technical NUP 06212, OPPTS Sections<br>830.6302, 830.6303, 830.6304, 830.6313<br>, 830.7000, 830.7050, 830.7200<br>830.7300, 830.7840, 830.7550 Product Safety Labs<br>Unpublished Study # 20811. 95 pages. | <b>47074503</b>    |
| 5.                | Comb (2006) Physical/Chemical Properties<br>Dicamba Technical NUP 06212,<br>OPPTS Sections 830.7950. Unpublished Study<br>by Huntingdon Life Sciences Ltd. Study # PSF0012/064285<br>20 pages total.                                                              | <b>47074504</b>    |

**Company Official:**

Theodore D. Head, Product Registration Manager

**Company Name:**

Nufarm Limited.

**Company Contact:**

Theodore D. Head

Phone: (630) 455-2000

|                |                                                                                                                |                                                                                                                                               |                                   |
|----------------|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| (A) <b>EPA</b> | United States Environmental Protection Agency<br>Office of Pesticide Programs (H7505C)<br>Washington, DC 20460 | <input checked="" type="checkbox"/> <b>Registration</b><br><input type="checkbox"/> <b>Amendment</b><br><input type="checkbox"/> <b>Other</b> | OPP Identifier Number             |
|                | <b>Application for Pesticide:</b>                                                                              |                                                                                                                                               | Please Attach<br>An Original Form |


|                                                                                                                                                                                                                    |                                                                                                                                                                                                          |                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| 504 <b>Section I</b>                                                                                                                                                                                               |                                                                                                                                                                                                          |                                                                                                            |
| 1. Company/Product Number<br>35935- [pending] <b>GI</b>                                                                                                                                                            | 2. EPA Product Manager<br>J. Miller                                                                                                                                                                      | 3. Proposed Classification<br><input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name)<br>Dicamba Technical                                                                                                                                                                     | PM#<br>23                                                                                                                                                                                                |                                                                                                            |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Nufarm Limited.<br>PO Box 13439<br>104 T.W. Alexander Drive,<br>Research Triangle Park, NC 27709<br><input type="checkbox"/> Check if this is a new address | 6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:<br><br>EPA Reg. No. [REDACTED]<br>Product Name [REDACTED] |                                                                                                            |

|                                                                                                                                                                                               |                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section II</b>                                                                                                                                                                             |                                                                                                                                                                                                      |
| <input type="checkbox"/> Amendment - Explain Below<br><input type="checkbox"/> Resubmission in response to Agency letter dated _____<br><input type="checkbox"/> Notification - Explain below | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____<br><input checked="" type="checkbox"/> "Me Too" Application<br><input type="checkbox"/> Other - explain below |

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II).

Application for registration.

|                                                                                                                                                                                                                                                                                |                                                                                                                                          |                                                                                                                                              |                                                                                                                                                                                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section III</b>                                                                                                                                                                                                                                                             |                                                                                                                                          |                                                                                                                                              |                                                                                                                                                                                                                             |
| 1. <b>Material This Product Will Be Packaged In:</b>                                                                                                                                                                                                                           |                                                                                                                                          |                                                                                                                                              |                                                                                                                                                                                                                             |
| Child-Resistant Packaging<br><input type="checkbox"/> Yes*<br><input checked="" type="checkbox"/> No<br>*Certification must be submitted.                                                                                                                                      | Unit Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No<br>If "Yes," Unit Package Wt. No. Per Container | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No<br>If "Yes," Package Wt. No. Per Container | 2. Type of Container<br><input type="checkbox"/> Metal<br><input checked="" type="checkbox"/> Plastic<br><input type="checkbox"/> Glass<br><input type="checkbox"/> Paper<br><input type="checkbox"/> Other (Specify) _____ |
| 3. Location of Net Contents Information<br><input checked="" type="checkbox"/> Label or <input checked="" type="checkbox"/> Container                                                                                                                                          |                                                                                                                                          | 4. Size(s) of Retail Container                                                                                                               | 5. Location of Label Directions<br><input checked="" type="checkbox"/> On Label or<br><input checked="" type="checkbox"/> On Labeling accompanying product                                                                  |
| 6. Manner In Which Label Is Affixed To Product<br><input checked="" type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other ( Self-Adhesive Integrated Label/Booklet )<br><input checked="" type="checkbox"/> Paper Glued<br><input type="checkbox"/> Stenciled |                                                                                                                                          |                                                                                                                                              |                                                                                                                                                                                                                             |

|                                                                                                                                                                                                                                                                                    |                                                  |                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| <b>Section IV</b>                                                                                                                                                                                                                                                                  |                                                  |                                                                                                                                  |
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)                                                                                                                                      |                                                  |                                                                                                                                  |
| Name<br>Theodore D. Head                                                                                                                                                                                                                                                           | Title Product Registration Manager / Agriculture | Telephone No. (Include Area Code)<br>(708) 754-3330                                                                              |
| <b>Certification</b><br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. |                                                  | 6. Date Application Received<br>(Stamped)<br> |
| 2. Signature                                                                                                                                                                                                                                                                       | 3. Title Product Registration Manager            |                                                                                                                                  |
| 4. Typed Name<br>Theodore D. Head                                                                                                                                                                                                                                                  | 5. Date<br>3-7-07                                |                                                                                                                                  |





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

March 9, 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

NUFARM LIMITED  
PO Box 13439  
RTP, NC 27709-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 08-MAR-07. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



**Nufarm Americas, Inc.**

150 Harvester Drive, Suite 200

Burr Ridge, IL 60527

Telephone: (630) 455.2000 Facsimile: (630) 455.2001

[www.us.nufarm.com](http://www.us.nufarm.com)

March 2, 2007

Document Processing Desk (REG FEE)  
Office of Pesticide Programs (7504P)  
U. S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 South Crystal Drive  
Arlington, VA 22202-4501

Attention: J. Miller, PM 23  
Herbicide Branch

Subject: Application for Registration  
Dicamba Technical  
EPA Reg. No. 35935-[Pending]

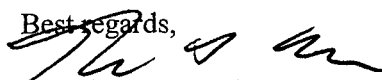
Dear Joanne:

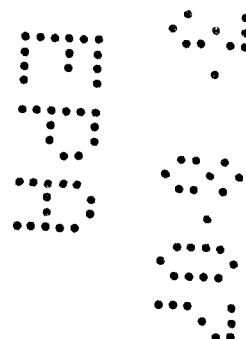
Enclosed is our application for registration of Dicamba Technical. We have chosen the cite-all method of data support and I am providing a list of companies that have been sent Notices of Intent to apply for Registration. Product specific studies submitted are itemized on the transmittal document. All EPA administrative forms are listed on the transmittal document and are contained in Volume 1 of the submission.

Nufarm believes that this submission falls within Fee For Service Category R31, New Product Non-Fast Track with a 6 month review and \$4200 fee.

Should you have any questions or the need for additional information please do not hesitate to contact me at 630-455-2000 or via e-mail [ted.head@us.nufarm.com](mailto:ted.head@us.nufarm.com).

Best regards,

  
Theodore D. Head  
Product Registration Manager



# TRANSMITTAL DOCUMENT

**Name and Address**

Nufarm Limited.  
PO Box 13439  
104 T.W. Alexander Drive,  
Research Triangle Park, NC 27709

**Regulatory action in support of  
Which this package is submitted:**

Application for registration of the technical product  
Dicamba Technical

**EPA Reg. No./File Symbol:**

35935-[Pending]

**Transmittal Date:**

March 2, 2007

**Volume No. 1, Administrative Material:**

|                  |                                                |
|------------------|------------------------------------------------|
| EPA Form 8570-1  | Application for Pesticide Registration         |
| EPA Form 8570-4  | Confidential Statement of Formula              |
| EPA Form 8570-34 | Certification with Respect to Citation of Data |
| EPA Form 8570-35 | Data Matrix                                    |
|                  | Proposed Labeling                              |

| Volume No. | Citation                                                                                                                                                                                                                                                          | MRID Number |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| 2.         | Cooke (2007) Product Chemistry Requirements<br>for Nufarm Dicamba Technical NUP 06212, OPPTS Sections<br>830.1550, 830.1600, 830.1620, 830.1670, 830.1750<br>830.1800 Unpublished study by Nufarm<br>Study No. RTP-07-006-REG 143 Pages Total.                    |             |
| 3.         | Sheehy (2007) Preliminary Analysis,<br>for Dicamba Technical NUP 06212, OPPTS Sections 830.1700<br>Unpublished study by Product Safety Labs<br>Study # 20809 Pages 39.                                                                                            |             |
| 4.         | Li (2007) Physical/Chemical Properties<br>for Dicamba Technical NUP 06212, OPPTS Sections<br>830.6302, 830.6303, 830.6304, 830.6313<br>, 830.7000, 830.7050, 830.7200<br>830.7300, 830.7840, 830.7550 Product Safety Labs<br>Unpublished Study # 20811. 95 pages. |             |
| 5.         | Comb (2006) Physical/Chemical Properties<br>Dicamba Technical NUP 06212,<br>OPPTS Sections 830.7950. Unpublished Study<br>by Huntingdon Life Sciences Ltd. Study # PSF0012/064285<br>20 pages total.                                                              |             |

Company Official:

Theodore D. Head, Product Registration Manager

Company Name:

Nufarm Limited.

Company Contact:

Theodore D. Head

Phone: (630) 455-2000

March 6, 2007

Nufarm Limited  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527  
630-455-2000  
[ted.head@us.nufarm.com](mailto:ted.head@us.nufarm.com)  
EPA Co. No. 35935

Product Name: Dicamba Technical 35935-[pending]

**EPA Form 8570-34**

Under EPA regulations 40 CFR 152.86(b)(2)(i) and 152.93(b) and EPA's policy regarding registrations, Nufarm Americas Inc has sent notification of intent to apply for registration of the product listed above.

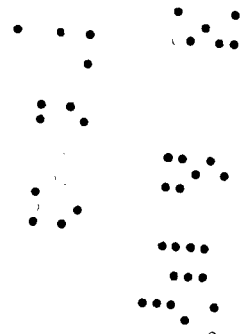
At such time as this registration application has completed review and decision to register has been reached by the Agency, please notify me at the contact information listed above and we will issue the Offer to Pay Letter as appropriate, along with a completed and signed EPA form 8570-34, Certification with Respect to Citation of Data.

For your records, enclosed are copies of the notices of intent letters, which have been sent.

Sincerely,



Theodore D. Head  
Nufarm Americas, Inc.  
Product Registration Manager



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.  
WASHINGTON, D.C. 20460

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

## Certification with Respect to Citation of Data

|                                                                                                                                                                                                        |                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Applicant's/Registrant's Name, Address, and Telephone Number<br>Nufarm Limited.<br>PO Box 13439<br>104 T.W. Alexander Drive,<br>Research Triangle Park, NC 27709<br>Telephone (630) 455-2000           | EPA Registration Number/File Symbol<br><br>35935 -[pending] |
| Active Ingredient(s) and/or representative test compound(s)<br>3,6-dichloro-2-methoxybenzoic acid                                                                                                      | Date<br>See Section III                                     |
| General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Appendix A)<br><br>Terrestrial food crop, terrestrial nonfood crop, forestry, aquatic noncrop, domestic outdoor. | Product Name<br>Dicamba Technical                           |

**NOTE:** If your product is a 100% repackaging of another EPA-registered product labeled for the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose.)

## SECTION I: METHOD OF DATA SUPPORT (Check one method only)

|                                                                                                                                                                                                              |                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). | <input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used). |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements).

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

## SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data Call-In response is supported by all data submitted or cited in the application for registration, the form for registration, or the Data Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements that I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

|           |      |                                                                                     |
|-----------|------|-------------------------------------------------------------------------------------|
| Signature | Date | Typed or Printed Name and Title<br>Theodore D. Head<br>Product Registration Manager |
|-----------|------|-------------------------------------------------------------------------------------|

EPA Form 8570-34 (Rev. 9-97) Electronic and Paper versions available. Submit only Paper version.



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

Libertas Now, Inc.  
419 Fourth Street  
Annapolis, MD 21403

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

In EPA's September 30, 2006 Listing of Pesticide Data Submitters, your company is included as one of those who have data on file at the Agency for dicamba. As such, Nufarm is providing your company notice of intent to apply for registration in accordance with EPA's recent interpretations of the above rules. *This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B).* As directed by EPA, prior to EPA's approval of Nufarm's registration, we will provide the appropriate party (ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

Bayer Advanced  
A Business Unit of Bayer Cropsciences LP  
PO Box 12014  
Research Triangle Park, NC 27709

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

IPM Resources LLC  
Agent for: Gharda USA, Inc.  
660 Newtown-Yardley Road, Suite 105  
Newtown, PA 18940

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs





Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

Albaugh, Inc.  
Agent for: Albaugh Inc.  
PO Box 2127  
Valdosta, GA 31604

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

Chemsico  
Division of United Industries Corp  
PO Box 142642  
St. Louis, MO 63114

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

BASF Corporation  
Agricultural Products  
PO Box 13528  
Research Triangle Park, NC 27709

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in black ink that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

PBI/Gordon Corp  
PO Box 014090  
Kansas City, MO 64101

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

The Scotts Company  
14111 Scottslawn Rd  
Marysville, OH 43041

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

Monsanto Co  
Agent for: Monsanto Company  
1300 I Street, NW, Suite 450 East  
Washington, DC 20005

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

BASF Corporation  
PO Box 13528  
Research Triangle Park, NC 27709

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

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Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



Nufarm Americas Inc.  
150 Harvester Drive, Suite 200  
Burr Ridge, IL 60527 USA  
Phone: 630.455.2000  
Fax: 630.455.2001  
www.us.nufarm.com

February 15, 2007

Certified Mail  
Return Receipt

Syngenta Crop Protection, Inc.  
Attn: Regulatory Affairs  
PO Box 18300  
Greensboro, NC 27419

Subject: Notice of Intent to Apply for Registration  
Dicamba & Dicamba Salts

Pursuant to 40 CFR §152.86(b)(2)(i) and 152.93(b)(2)(i) and EPA's policy regarding registration notifications, Nufarm Americas Inc. hereby notifies you of our intent to apply for registration of the technical active ingredient, dicamba.

In EPA's September 30, 2006 Listing of Pesticide Data Submitters, your company is included as one of those who have data on file at the Agency for dicamba. As such, Nufarm is providing your company notice of intent to apply for registration in accordance with EPA's recent interpretations of the above rules. *This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B).* As directed by EPA, prior to EPA's approval of Nufarm's registration, we will provide the appropriate party (ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Regards,

A handwritten signature in cursive script that reads 'Jeannie Smith'.

Jeannie Smith  
Vice President  
Registrations & Regulatory Affairs



# DICAMBA ACID TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

**ACTIVE INGREDIENT:**

Dicamba (3,6-dichloro-p-anisic acid) ..... 98%

**OTHER INGREDIENTS:** ..... 2%

**TOTAL:** ..... 100%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

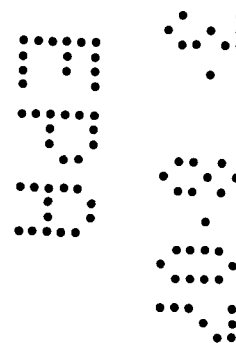
EPA REG. NO.  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM INC.  
BURR RIDGE, IL 60527



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**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS  
DANGER**

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

| FIRST AID                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IF IN EYES                                                                                                                                                                                                                      | <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                       |
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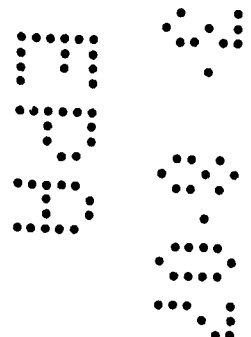
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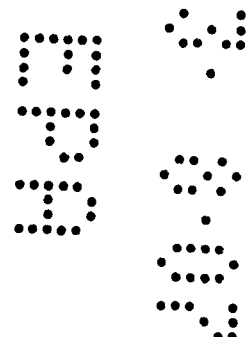
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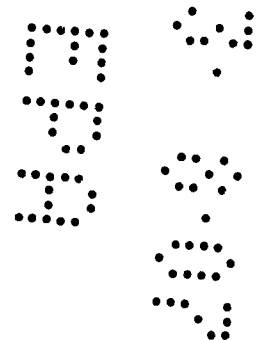
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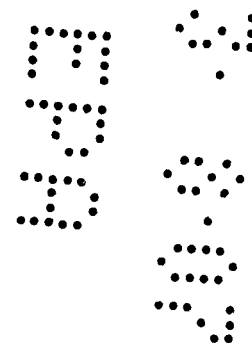
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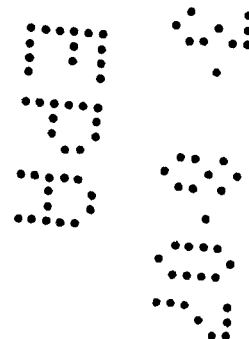
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(RV121906)



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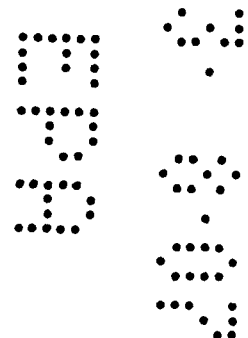
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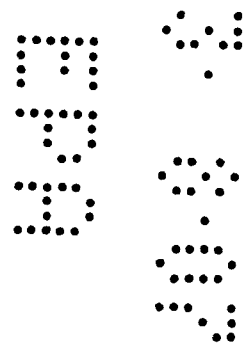
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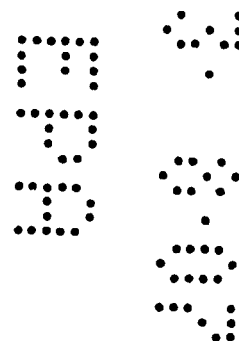
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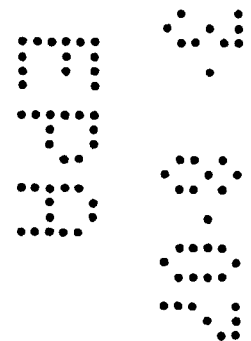
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| IF ON SKIN<br>OR CLOTHING                                                                                                                                                                                                       | <ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                                                                                         |
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| <b>NOTE TO PHYSICIAN</b><br>Probable mucosal damage may contraindicate the use of gastric lavage.                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                           |

**ENVIRONMENTAL HAZARDS**

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**DIRECTIONS FOR USE**

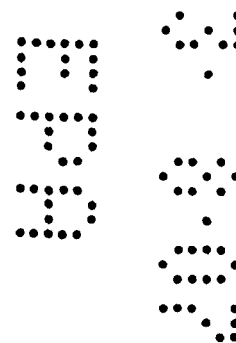
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The user is solely responsible for determination of suitability of the use of this product for any specific purpose, any manufacturing practice employed, and adoption of such safety precautions as may be necessary.



#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

**PESTICIDE STORAGE:** Store in original container in a well-ventilated area separately from fertilizer, feed and foodstuffs. Avoid cross-contamination with other pesticides. Spillage or leakage should be contained, carefully swept up and collected for disposal. Wash area of spill with detergent and water. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

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#### WARRANTY DISCLAIMER

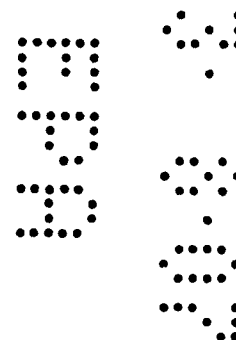
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(RV121906)



# DICAMBA ACID TECHNICAL

FOR MANUFACTURING PURPOSES ONLY

**ACTIVE INGREDIENT:**

Dicamba (3,6-dichloro-*p*-anisic acid) ..... 98%

**OTHER INGREDIENTS:** ..... 2%

**TOTAL:** ..... 100%

**KEEP OUT OF REACH OF CHILDREN  
DANGER**

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300  
For Medical Emergencies Only, Call (877) 325-1840

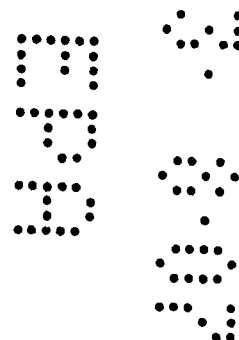
EPA REG. NO.  
EPA EST. NO.

MANUFACTURED FOR  
NUFARM INC.  
BURR RIDGE, IL 60527



NET CONTENTS

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**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS & DOMESTIC ANIMALS  
DANGER**

Corrosive. Causes irreversible eye damage. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear goggles or face shield when handling. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

| FIRST AID                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IF IN EYES                                                                                                                                                                                                                      | <ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>                                                       |
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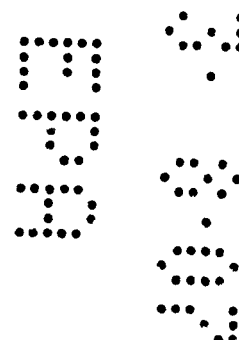
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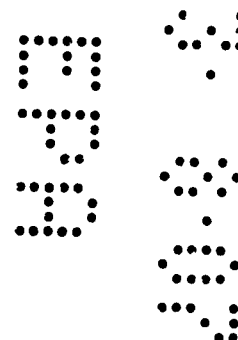
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(RV121906)



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WASHINGTON, D.C. 20460

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## DATA MATRIX

|                                                                                                                                             |                                                                    |                              |                 |             |
|---------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|------------------------------|-----------------|-------------|
| Date                                                                                                                                        | March 2, 2007                                                      | EPA Reg. No./File Symbol     | 35935-[Pending] | Page 1 of 5 |
| Applicant's/Registrant's Name & Address<br>Nufarm Limited.<br>PO Box 13439<br>104 T.W. Alexander Drive,<br>Research Triangle Park, NC 27709 |                                                                    | Product<br>Dicamba Technical |                 |             |
| Ingredient: Dicamba: 3,6-dichloro-2-methoxybenzoic acid                                                                                     |                                                                    |                              |                 |             |
| Guideline Reference Number                                                                                                                  | Guideline Study Name                                               | MRID Number                  | Submitter       | Status      |
| OPPTS Series 830                                                                                                                            | Product Properties                                                 |                              |                 |             |
| 830.1550                                                                                                                                    | Product identity and composition                                   |                              | Nufarm Limited  | OWN         |
| 830.1600                                                                                                                                    | Description of materials used to produce the product               |                              | Nufarm Limited  | OWN         |
| 830.1620                                                                                                                                    | Description of production process                                  |                              | Nufarm Limited  | OWN         |
| 830.1650                                                                                                                                    | Description of formulation process                                 |                              |                 | 1           |
| 830.1670                                                                                                                                    | Discussion of formation of impurities                              |                              | Nufarm Limited  | OWN         |
| 830.1700                                                                                                                                    | Preliminary analysis                                               |                              | Nufarm Limited  | OWN         |
| 830.1750                                                                                                                                    | Certified limits                                                   |                              | Nufarm Limited  | OWN         |
| 830.1800                                                                                                                                    | Enforcement analytical method                                      |                              | Nufarm Limited  | OWN         |
| 830.1900                                                                                                                                    | Submittal of samples                                               |                              |                 | 2           |
| 830.6302                                                                                                                                    | Color                                                              |                              | Nufarm Limited  | OWN         |
| 830.6303                                                                                                                                    | Physical state                                                     |                              | Nufarm Limited  | OWN         |
| Signature                                                                                                                                   | Name and Title<br>Theodore D. Head<br>Product Registration Manager |                              | Date<br>3-7-07  |             |



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| Ingredient: Dicamba: 3,6-dichloro-2-methoxybenzoic acid                                                                                     |                                                                                  |                              |                 |             |
| Guideline Reference Number                                                                                                                  | Guideline Study Name                                                             | MRID Number                  | Submitter       | Status      |
| OPPTS Series 830                                                                                                                            | Product Properties (continued)                                                   |                              |                 |             |
| 830.6304                                                                                                                                    | Odor                                                                             |                              | Nufarm Limited  | OWN         |
| 830.6313                                                                                                                                    | Stability to normal and elevated temperatures, metals, and metal ions            |                              | Nufarm Limited  | OWN         |
| 830.6314                                                                                                                                    | Oxidation/reduction: chemical incompatibility                                    |                              |                 | 6           |
| 830.6315                                                                                                                                    | Flammability                                                                     |                              |                 | 3           |
| 830.6316                                                                                                                                    | Explosibility                                                                    |                              |                 | 3           |
| 830.6317                                                                                                                                    | Storage stability                                                                |                              | Pending         | OWN         |
| 830.6319                                                                                                                                    | Miscibility                                                                      |                              |                 | 3           |
| 830.6320                                                                                                                                    | Corrosion characteristics                                                        |                              | Pending         | OWN         |
| 830.6321                                                                                                                                    | Dielectric breakdown voltage                                                     |                              |                 | 4           |
| 830.7000                                                                                                                                    | pH                                                                               |                              | Nufarm Limited  | OWN         |
| 830.7050                                                                                                                                    | UV/Visible absorption                                                            |                              | Nufarm Limited  | OWN         |
| Signature                                                                                                                                   | Name and Title<br>Theodore D. Head<br>Product Registration Manager / Agriculture |                              | Date<br>3-7-07  |             |

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.


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| Ingredient: Dicamba: 3,6-dichloro-2-methoxybenzoic acid                                                                                     |                                                             |                                                                                  |                 |                |
| Guideline Reference Number                                                                                                                  | Guideline Study Name                                        | MRID Number                                                                      | Submitter       | Status         |
| OPPTS Series 830                                                                                                                            | Product Properties (continued)                              |                                                                                  |                 |                |
| 830.7100                                                                                                                                    | Viscosity                                                   |                                                                                  |                 | 3              |
| 830.7200                                                                                                                                    | Melting point/melting range                                 |                                                                                  | Nufarm Limited  | OWN            |
| 830.7220                                                                                                                                    | Boiling point/boiling range                                 |                                                                                  |                 | 4              |
| 830.7300                                                                                                                                    | Density/relative density/bulk density                       |                                                                                  | Nufarm Limited  | OWN            |
| 830.7370                                                                                                                                    | Dissociation constants in water                             |                                                                                  | Nufarm Limited  | OWN            |
| 830.7520                                                                                                                                    | Particle size, fiber length, and diameter distribution      |                                                                                  |                 | 5              |
| 830.7550                                                                                                                                    | Partition coefficient (n-octanol/water), shake flask method |                                                                                  | Nufarm Limited  | OWN            |
| Signature                                              |                                                             | Name and Title<br>Theodore D. Head<br>Product Registration Manager / Agriculture |                 | Date<br>3-7-07 |

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| Guideline Reference Number                                                                                                                  | Guideline Study Name                                        | MRID Number                                                                      | Submitter       | Status         | Note |
| OPPTS Series 830                                                                                                                            | Product Properties (continued)                              |                                                                                  |                 |                |      |
| 830.7840                                                                                                                                    | Water solubility: column elution method; shake flask method |                                                                                  | Nufarm Limited  | OWN            |      |
| 830.7950                                                                                                                                    | Vapor pressure                                              |                                                                                  | Nufarm Limited  | OWN            |      |
|                                                                                                                                             |                                                             |                                                                                  |                 |                |      |
|                                                                                                                                             |                                                             |                                                                                  |                 |                |      |
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|                                                                                                                                             |                                                             |                                                                                  |                 |                |      |
|                                                                                                                                             |                                                             |                                                                                  |                 |                |      |
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